

#### UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5 77 WEST JACKSON BOULEVARD CHICAGO, IL 60604-3590

WAR 10-7 2016

REPLY TO THE ATTENTION OF:

### CERTIFIED MAIL 7009 1680 0000 7669 2236 RETURN RECEIPT REQUESTED

Christine (Tina) Reese Project Manager/Hydrogeologist Symbiont 6737 West Washington Street Suite 3440 Milwaukee, Wisconsin 53214

> Re: Notice of Violation RCRA Compliance Evaluation Inspection Trent Tube Plant #1 EPA I.D. No.: WID006097281

Dear Ms. Reese:

On February, 13, 2013, a representative of the U.S. Environmental Protection Agency Region 5 and Wisconsin Department of Natural Resources inspected Trent Tube Plant #1 (Trent Tube), located at 2188 Church Street in East Troy, Wisconsin. The purpose of the inspection was to evaluate Trent Tube Plant's compliance with certain requirements of the Resource Conservation and Recovery Act (RCRA); specifically, those regulations related to the generation, treatment, and storage of hazardous waste by a large quantity generator of such wastes. We have enclosed a copy of the EPA inspection report and checklists for your reference.

Based on information provided by Trent Tube Plant personnel, a review of records and personal observations by inspectors, EPA finds Trent Tube Plant is engaged in the management of hazardous waste and is in violation of certain requirements of the United States Code of Federal Regulations (C.F.R.) and the Wisconsin Administrative Code (WAC). Specifically, we find that Trent Tube is in violation of the following hazardous waste requirements:

1. A generator who transports, or offers for transport a hazardous waste for off-site treatment, storage, or disposal, must prepare a Manifest (OMB Control number 2050-0039) on EPA Form 8700-22, and, if necessary, EPA Form 8700-22A, according to the instructions included in the appendix to 40 C.F.R. part 262. See, WAC NR § 662.020(1) [40 C.F.R. § 262.20]. The specific manifest requirements include but are not limited to reading, signing, and dating the waste minimization certification statement.

The review of manifest tracking numbers 0030677844JJK, 001549988GBFF, and 003067843JJK indicated the generator had not dated the manifests. Trent Tube, therefore, violated the above- reference generator manifest requirements.

2. A generator shall, for shipments of hazardous waste outside of Wisconsin, submit a copy of each manifest to the Department within 30 days of receiving the signed copy from the designated facility. See, WAC NR § 662.023(3) [40 C.F.R. § 262.23(3)].

The review of manifest indicated that there were out-of-state manifests that were not sent to WDNR within thirty days of receiving a signed copy from the designated facility. WDNR Manifest Records for Selected Generator Shipped Between 02/01/2010 and 02/01/2013 Report indicated the following missing manifests: (1) 003067853JJK (shipment date 01/09/13; (2) 003067840JJK (shipment date 02/25/10; (3) 003067844 (shipment date 03/28/11); and (4) 003067843 (shipment date 03/28/11). Trent Tube, therefore, violated the above-referenced generator manifest requirements.

3. A generator must mark each package of hazardous waste in accordance with the applicable Department of Transportation regulations on hazardous materials under 49 CFR part 172 before transporting or offering hazardous waste for transportation off-site. See, WAC NR § 662.032(1) [40 C.F.R. § 262.32].

At the time of the inspection, a container was not marked with the U.S. DOT proper shipping name and identification number as identified in 49 CFR 172. Trent Tube, therefore, violated the above-referenced generator pre-transport requirements. However, on May 13, 2013, a photograph was forwarded to document the marking of the container with the shipping name and identification number. Therefore, no further action is required to comply with this requirement.

4. A generator must retain on-site a copy of all notices, certifications, waste analysis data, and other documentation produced pursuant to this section for at least three years from the date that the waste that is the subject of such documentation was last sent to an on-site or off-site treatment, storage, or disposal. See, WAC NR § 668.07(1)(h) [40 CFR § 268.7(a)(8)].

A review of hazardous waste records did not show record or notice of a determination made on whether the listed hazardous waste needed to be treated or not before it could be land disposed. Thus, there was no land disposal restriction notification available for hazardous waste listed in the following manifests: (1) 003067915JJK; (2) 003067840JJK; (3) 002684092JJK; (4) 003067839JJK; (5) 003067836JJK; (6) 003067841JJK; (7) 008337137JJK; (8) 007863229JJK; (9) 003067853JJK; (10) 008434418JJK; (11) 002684052JJK; 003067843JJK; (12) 001549988GBF; and (13) 003067844JJK. Trent Tube, therefore, violated the above-referenced land disposal restriction requirements.

5. In order to avoid the need for a hazardous waste storage operating license, a large quantity generator using containers to accumulate hazardous waste must inspect the areas where containers are stored at least weekly. See, WAC NR § 662.034(1)(a)1 [40 CFR §

262.34]. This is also a requirement of owners and operators of hazardous waste storage facilities that store hazardous waste, under WAC NR § 662.0174 [40 CFR § 265.174].

Review of records provided indicated containers storing hazardous waste in the 90-day storage area were not inspected weekly. Trent Tube, therefore, violated the above-referenced condition for a storage license exemption, and violated the storage facility container area inspection requirement.

Under Section 3008(a) of the Resource Conservation and Recovery Act (RCRA), 42 U.S.C. § 6928(a), U.S. EPA may issue an order assessing a civil penalty for any past or current violation requiring compliance immediately or within a specified time period. Although this letter is not such an order, we request that you submit a written response to the violations cited above within 30 days of receipt of this letter. The response should document the actions, if any, which you have taken since the inspection to comply with the above requirements.

You should submit your response to Cindy Dabner, United States Environmental Protection Agency, Region 5, 77 West Jackson Boulevard, LR-8J, Chicago, Illinois 60604.

If you have any questions or concerns regarding this letter, please contact Cindy Dabner, of my staff, at 312-886-5890.

Sincerely,

Gary J. Victorine, Chief

RCRA Branch

cc: Dolores Hayden, WDNR – Southeast Region Headquarters

dolores.hayden@wisconsin.gov

**Enclosures** 

### UNITED STATES ENVIRONMENTAL PROTECTION AGENCY REGION 5, LCD, RCRA BRANCH, LR8J 77 WEST JACKSON BLVD CHICAGO, IL 60604

#### RCRA COMPLIANCE EVALUATION INSPECTION REPORT

SITE NAME:

TRENT TUBE PLANT No. 1

**EPA ID NUMBER:** 

WID006097281

ADDRESS:

2188 Church Street, East Troy, WI 53120

**DATE OF INSPECTION:** February 13, 2013

**EPA INSPECTOR:** 

Cindy Dabner

**Environmental Scientist** 

PREPARED BY:

Cindy Dabner

Compliance Section 2

ACCEPTED BY:

Julie Morris, Chief,

Compliance Section 2

Date

### Purpose of the Inspection

This inspection was an evaluation of Trent Tube Plant No. 1's compliance with hazardous waste regulations found at Wisconsin Administrative Code Chapter Nature Resources (WAC NR) 660 through 679 and Title 40 of the Code of Federal Regulations (40 CFR), Parts 260 through 279. Inspector Cindy Dabner of the U.S. Environmental Protection Agency Region 5 conducted the inspection with Inspector Dolores Hayden of the Wisconsin Department of Natural Resources. The inspection was an EPA lead Resource Conservation and Recovery Act (RCRA) compliance evaluation (CEI). The site notified as a large quantity generator (LQG).

#### **Participants**

U.S. Environmental Protection Agency (U.S. EPA) Inspector Cindy Dabner, U.S. EPA Region 5

State of Wisconsin Department of Natural Resources (WDNR) Inspector Dolores Hayden, WDNR

Trent Tube Plant No. 1 Representative Tina Reese, Project Manager, Hydrogeologist P.G., Symbiont

#### Introduction

On February 13, 2013, Inspectors Dabner arrived to the site at approximately 9:50 a.m. However, upon arrival to the site, the inspector noticed a vacant lot. Both Inspector Hayden and Inspector Dabner contacted the facility representative, Ms. Tina Reese. Ms. Reese informed the inspectors that her office was located nearly an hour away from the facility. At approximately 1:00 pm, Ms. Reese arrived to the site the inspection.

The inspection began with an opening conference, Inspector Dabner inquired about the safety measures required to conduct during the inspection tour. She also discussed confidential business information (CBI) and the use of a camera during the inspection. Trent Tube Plant No. 1 did not make any CBI claims on: (1) the information provided to the inspectors; or (2) photographs taken during the inspection. Inspector Dabner provided a Small Business Resources information Sheet and Pollution Prevention Brochure to Ms. Reese.

#### **Site Description**

Trent Tube Plant No. 1 consists of an 11- acre parcel of land that is bounded on the south and the east by Honey Creek, to the west and Highway G, and to the north Trent Street. The three standing buildings included Building#1, Building#2 and the Skimmer Building. Trent Tube Plant 1 is no longer an operating manufacturing facility. The manufacturing process ceased in 1995 and the building was demolished in 1998. Previous facility activities included industrial manufacturing of stainless steel tubing. The manufacturing impacts to soil, groundwater, and

sediment at the site and the adjacent wetland includes residual pickling acids, volatile organic compounds, polynuclear aromatic hydrocarbons, and heavy metals.

Trent Tube Plant No. 1 property has an active a groundwater extraction and treatment system that was designed and installed to minimize the migration of impacted groundwater to Honey Creek. Hazardous waste is generated as a result of the remediation of contaminated soil, sediment, and groundwater.

The hazardous waste streams generated at Trent Tube Plant No. 1 includes the following: (1) personal protective equipment (PPE) (F001 and F002); (2) free product (D040 and F002); (3) system sludge (F002); and (4) spent granite active carbon (F002, F001, U226, and U228).

#### Site Tour

Ms. Reese escorted Inspector Hayden and Inspector Dabner to Building #2. According to the facility representative, hazardous is only stored in Building #2. The approximate size of Building #2 is 24' x 26'. In Building #2, Inspector Dabner observed two 55-gallon drums, three processing tanks, a settlement tank, and a treatment tank. Pictures were taken of the tanks and two 55-gallon drums. See Photographs#5-14.

In Building #2, the inspector observed Drum#1 located in the 90 Day Container Accumulation Area. Ms. Reese informed Inspector Dabner that the Drum#1 contained system sludge waste. Ms. Reese opened Drum#1. Inspector Dabner observed Drum#1 filled to capacity with what appeared to be system sludge. See Photographs#5-8. Drum#1 was marked as hazardous waste with EPA Waste Codes F001, F002, U226, and U228. The accumulation start date was marked 12/18/12. The Inspector did not observe information concerning the Department of Transportation (DOT) proper shipping name.

The inspection moved to Drum#2 in Building #2. Ms. Reese informed Inspector Dabner that the Drum#2 contained PPE and filters. See Photographs#9-10. When the drum was opened, the Inspector observed a 55-gallon drum not filled to capacity. Drum#2 was marked with an accumulation start date of 6/1/12. Drum#2 was labeled EPA Waste Codes F001, F002, U226, and U228. The DOT proper shipping name was marked as PPE and filters. See Photographs#3-4.

The inspector observed the water treatment system. See Photograph#11-12.

The inspection proceeded to a Recovery Well located behind Building #2. Ms. Reese informed the inspector that impacted groundwater is recovered at this well to be treated. Ms. Reese also explained that free product is recovered from RW#3. RW#3 is located along the bank area. No free product was observed in RW#3 at the time of the inspection. See Photograph#11-13.

During the inspection, the Inspectors observed fire extinguishers, spill control equipment, internal communications systems, and alarm systems in Building #2.

### Record Review

During the inspection, the Inspectors requested to review hazardous waste determination documents, hazardous waste manifest, land disposal restriction (LDR) forms, universal waste documents, personnel training documents, weekly inspection logs, and personnel training records for the past three years. The inspector reviewed available hazardous waste manifest, land disposal restriction records, and material data sheets during the inspection. The facility was determined to be an episodic large quantity generator three times out of the year.

### Weekly Inspection Logs:

The inspector observed one 55 gallon drum stored in the 90 Day Storage Accumulation Area. Weekly Inspection logs were not made available at the time of the inspection.

The Inspectors noted some discrepancies with the Hazardous Waste Manifest:

Manifest Tracking Number	Discrepancy
003067844JJK	Manifest not forwarded to WDNR according to WDNR HW Manifest Report 01/01/2008 thru 02/04/2013; Designated Facility: Siemens Water Technologies Darlington, PA 26115 (3/28/11) Spent Activated Carbon Generator date none; Transporter date 03/22/11; Designated Treatment Facility date 03/28/11
003067853JJK	Manifest not forwarded to WDNR according to WDNR Report 01/01/2008 thru 02/04/2013; Designated Facility: Siemens Industry, Inc Water Darlington, PA 26115 Spent Carbon with TCE Generator date 10/17/12; Transporter date 12/17/12; Designated Treatment Facility date 1/9/13
003067843JJK	Manifest not forwarded to WDNR according to WDNR Report 01/01/2008 thru 02/04/2013; Designated Facility: Siemens Water Technologies Darlington, PA 26115 Spent Carbon with TCE Generator date none; Transporter date 03/22/11; Designated Treatment Facility date 03/28/11

001549988GBF	Designated Facility: Badger Disposal of WI, Milwaukee, WI Manifest not signed by the Designated Facility Generator date none; Transporter date 8/29/11; Designated Treatment Facility date none
003067840JJK	Manifest not forwarded to WDNR according to WDNR HW Manifest Report 01/01/2008 thru 02/04/2013; Designated Facility: Michigan Disposal Waste Treatment Plant, Belleville, MI Systems Sludge Generator date 08/12/10; Transporter date 08/18/10; Designated Treatment Facility date 08/25/10

Land Disposal Restriction Review:

Manifest Tracking #	LDR
003067915ЈЈК	Not available
003067840ЈЈК	Not available
002684092JJK	Not available
003067839JJK	Not available
003067836JJK	Not available
003067841JJK	Not available
008337137JJK	Not available
001686500GBF	Not available
007863229JJK	Not available
003067853ЈЈК	Not available
008434418JJK	Not available
002684052JJK	Not available
003067843JJK	Not available
001549988GBF	Not available
003067844JJK	Not available

### **Closing Conference**

A closing conference was conducted with Ms. Reese. Inspector Dabner summarized the areas of concern noted during the inspection, and explained how the observation notes would be reviewed and used to generate an inspection report. Inspector Dabner briefly discussed EPA's procedures for following up with the facility representative after conducting an inspection. The inspection concluded at approximately 3:45 p.m.

### Post-Inspection

Prior to completion of this inspection report, Ms. Reese provided Inspector Dabner supplemental information. Training records, contingency plan and emergency procedures, and 2011 hazardous

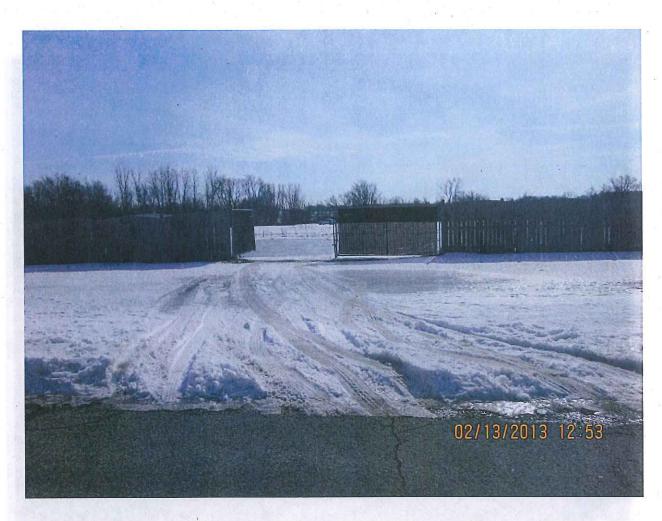
waste manifest, land disposal restriction forms, and hazardous waste profiles were forwarded to the Inspector following the inspection. Supplemental information is provided in Attachment E-Trent Tube Post-Inspection Document Log.

### **Attachments**

- A. Trent Tube Plant#1 Inspection Photographs
- B. Trent Tube Plant#1 Photograph Log
- C. WDNR Large Quantity Generator Inspection Checklist
- D. Trent Tube Plant#1 Document Log
- E. Trent Tube Plant#1 Post-Inspection Document Log

### ATTACHMENT A

Trent Tube Plant#1 Inspection Photographs
WID006097281



Photograph: #1

Name of Photographer: Cindy Dabner Date/Time of Photograph: February 13, 2013

Site Location: 2188 Church Street, East Troy, WI 53120

Description: Entrance to Trent Tube Plant #1



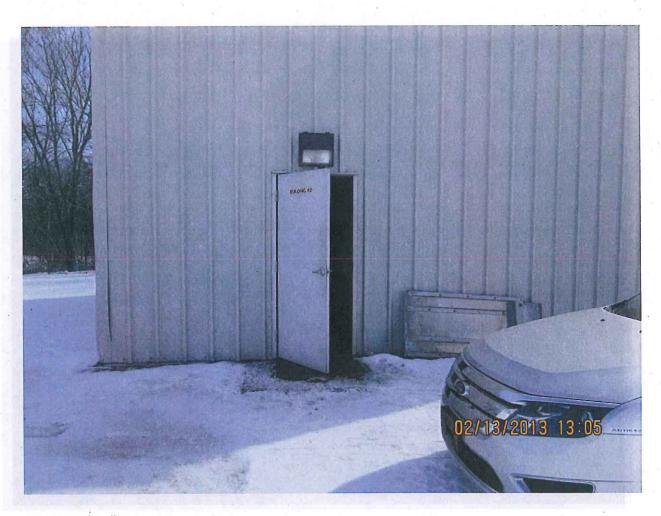
Photograph: #2

Name of Photographer: Cindy Dabner

Date/Time of Photograph: February 13, 2013

Site Location: 2188 Church Street, East Troy, WI 53120

Description: Gate Entrance to Trent Tube Plant#1



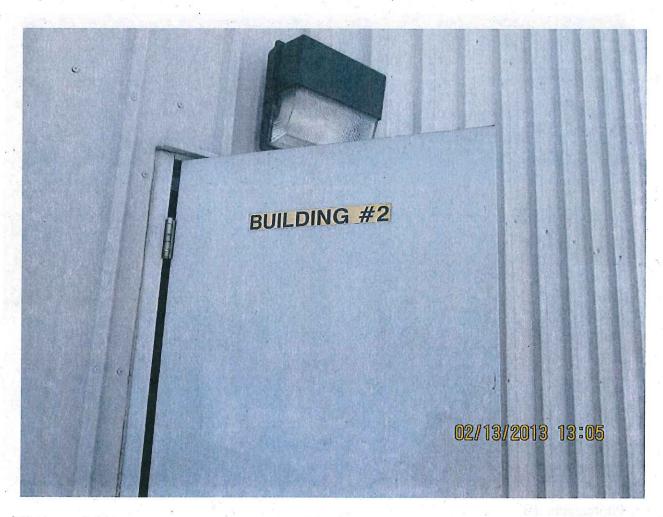
Photograph: #3

Name of Photographer: Cindy Dabner

Date/Time of Photograph: February 13, 2013

Site Location: 2188 Church Street, East Troy, WI 53120

Description: Entrance to Accumulation Area Center located in Building #2



Photograph#4

Name of Photographer: Cindy Dabner

Date/Time of Photograph:

Site Location: 2188 Church Street, East Troy, WI 53120

Description: Building #2 Entrance Door



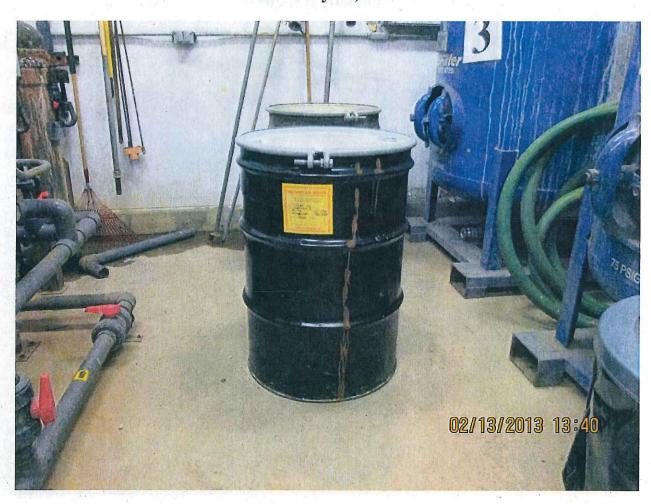
Photograph: #5

Name of Photographer: Cindy Dabner

Date/Time of Photograph: February 13, 2013

Site Location: 2188 Church Street, East Troy, WI 53120

Description: Accumulation Area Center with two 55 gallon drums storing hazardous waste

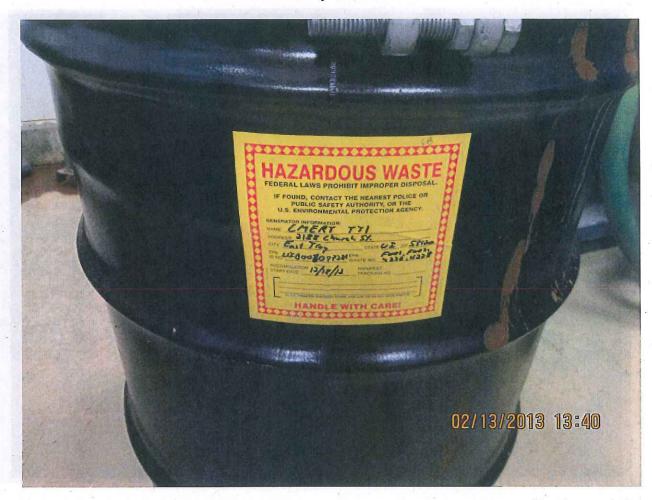


Photograph: #6

Name of Photographer: Cindy Dabner

Date/Time of Photograph: February 13, 2013

Site Location: 2188 Church Street, East Troy, WI 53120 Description: Two 55 gallon drums storing hazardous waste



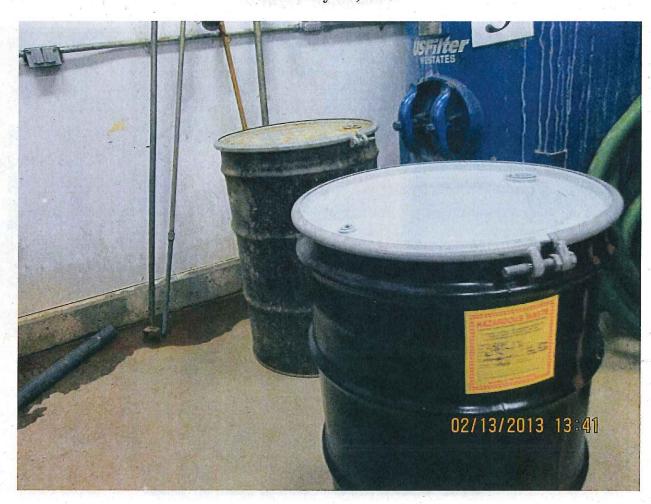
Photograph: #7

Name of Photographer: Cindy Dabner

Date/Time of Photograph: February 13, 2013

Site Location: 2188 Church Street, East Troy, WI 53120

Description: Drum#1 Hazardous Waste Label with Accumulation Start Date 12/18/12



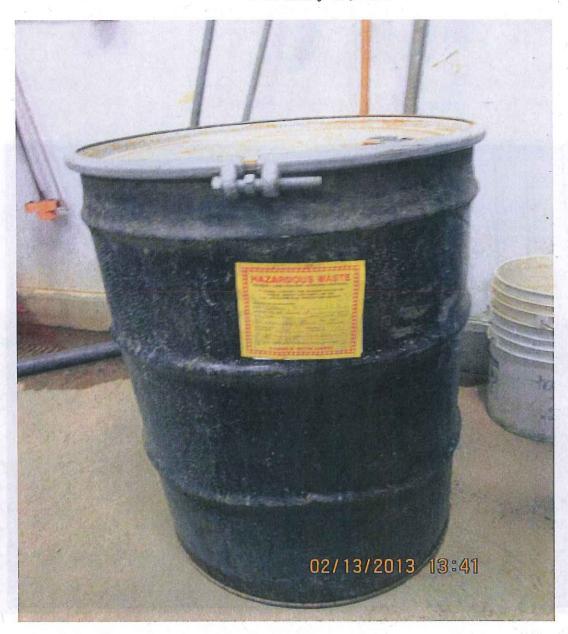
Photograph: #8

Name of Photographer: Cindy Dabner

Date/Time of Photograph: February 13, 2013

Site Location: 2188 Church Street, East Troy, WI 53120

Description: Drum#1 and Drum#2



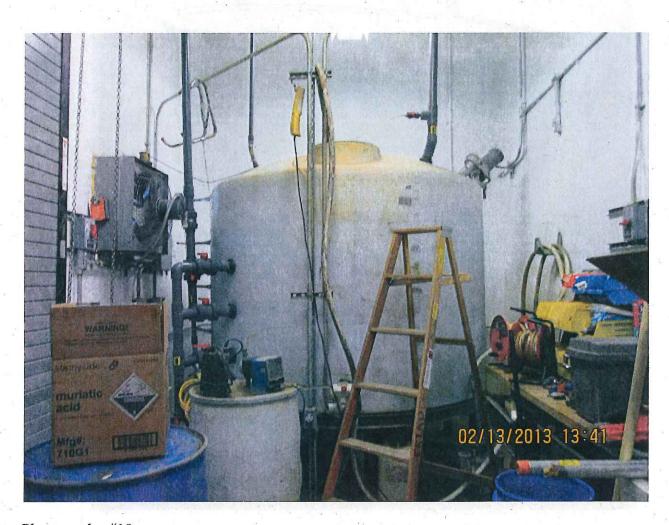
Photograph: #9

Name of Photographer: Cindy Dabner

Date/Time of Photograph: February 13, 2013

Site Location: 2188 Church Street, East Troy, WI 53120

Description: Drum#2 Hazardous Waste Label with Accumulation Start Date 6/1/12



Photograph: #10

Name of Photographer: Cindy Dabner

Date/Time of Photograph: February 13, 2013

Site Location: 2188 Church Street, East Troy, WI 53120

Description: Wastewater Treatment System Located in Building #2



Photograph: #11

Name of Photographer: Cindy Dabner

Date/Time of Photograph: February 13, 2013

Site Location: 2188 Church Street, East Troy, WI 53120 Description: Wastewater Treatment System Components



Photograph: #12

Name of Photographer: Cindy Dabner Date/Time of Photograph: February 13, 2013

Site Location: 2188 Church Street, East Troy, WI 53120 Description: Recovery Well Located Behind Building #2



Photograph: #13

Name of Photographer: Cindy Dabner

Date/Time of Photograph: February 13, 2013

Site Location: 2188 Church Street, East Troy, WI 53120

Description: Groundwater Extraction and Treatment System Located in Building #2

### ATTACHMENT B

### Trent Tube Plant#1 Photograph Log WID006097281

### Attachment B- Trent Tube Plant No. 1 Photograph Log WID006097281

Photographer: US EPA Inspector Cindy Dabner

Location: Trent Tube Plant No. 1, 2188 Church Street, Eat Troy, WI 53120

**Date(s):** February 13, 2013

Photo #	Description	Date and Time
1	Entrance to Trent Tube Plant#1	2/13/13
2	Gate Entrance to Trent Tube Plant#	2/13/13
3	Entrance to Accumulation Area Center located in Building #2	2/13/13
4	Building #2 Entrance Door	2/13/13
5	Accumulation Area Center with two 55 gallon drums storing hazardous waste	2/13/13
6	Two 55 gallon drums storing hazardous waste	2/12/13
7	Drum#1 Hazardous Waste Label Accumulation Start Date 12/18/12	2/12/13
8	Drum #1 and Drum# 2	2/12/13
9	Drum#2 Hazardous Waste Label Accumulation Start Date 6/1/12	2/12/13
10	Waste Water Treatment System Located in Building #2	2/12/13
11	Wastewater Treatment System Components	2/12/13
12	Recovery Well located Behind Building #2	2/12/13
13	Groundwater Extraction and Treatment System Located in Building #2	2/12/13

### ATTACHMENT C

WDNR Large Quantity Generator Inspection Checklist Trent Tube Plant#1WID006097281

#### WISCOSAI SEPT OF AN IPSOURCES REVISION: 03/19/2012 WASTE & MATERIALS MANAGEMENT PROGRAM

Section 1: Waste Information

### LARGE QUANTITY GENERATOR INSPECTION

This Inspection Form, used for the inspection of facilities that generate over 1000 kg (2205 lbs) of non acute hazardous waste in a calendar month or over 1 kg of acute hazardous waste in a calendar month, evaluates compliance with Wisconsin's Hazardous Waste Management Rules (chapter NR 660 - 679, Wis. Admin. Code).

A. Hazardous waste determination has been made on each solid waste generated.	11	662.011
S hands 1	Y	Photo
B. Waste determination was made correctly, considering the listed waste definitions and the	11	662.011(3)
characteristics of the waste, in light of the materials or processes used.	Y	Photo
C. Waste samples are analyzed by laboratories certified or registered under NR 149. Provide lab names and certification numbers. Bulger Lab, Commin	1/	662.011(3)(a)
West the Richard Common Roc. Rest Knew Ca	У	Photo
D. Generator keeps records of all waste determinations on-site for at least three years from the	1/	662.040(3)
date the waste was last sent to a storage, treatment or disposal facility.	y	Photo
E. Generator submitted a notification form and obtained an EPA ID#.	1/	662.012
Note: A subsequent notification should be submitted when there is an ownership or name	У	Photo [
change.		
n 2: Manifest, Pre-Transport Requirements and Off-Site Shipments		
Dolors (1971)		
A. Generator initiated a manifest with all off-site shipments of hazardous waste.	11	662.020(1)
	V	Photo
B. The manifest is used according to the instructions in the appendix to 40 CFR part 262.	A	662.020(1)
Total Principal	IV	Photo
C. The facility designated on the manifest is permitted or licensed to accept the waste.	1/	662.020(2)
Laton's Ph	X	Photo _
D. For out-of-state shipments, a copy of the manifest is sent to the department within 30 days	11	662.023(3)
of receiving the signed copy from the designated facility.	IV	Photo _
E. Manifest continuation form, EPA form 8700-22A, is prepared according to the instructions in	MΛ	662.020(1)
the appendix of 40 CFR part 262.	117	Photo
F. If the generator received a shipment back as a rejected load, the returned waste was	IA A	662.034(13)
accumulated in compliance with the container or tank standards for less than 90 days.	IVA	Photo
G. Upon receipt of the rejected shipment, the generator signed EITHER of the following:	nn	662.034(13)
<ol> <li>Manifest Item 18c if the transporter returned the shipment using the original manifest.</li> <li>Manifest Item 20 if the transporter returned the shipment using a new manifest.</li> </ol>	IM	Photo
H. A copy of the manifest signed by the generator is retained until the signed copy from the	11	662.040(1)
designated facility is received.	X	Photo _
Copy of each manifest is kept for at least three years from the date of shipment.	11/	662.040(1)
in a manner or bake the order to mean 600 to of the following two high bar 900th	Y	Photo
J. Hazardous waste is packaged according to applicable DOT requirements before transport.		662.030
	1 1/1	The second second second second

Code/Stat ?: C: Compliance CA: Compliance with Concern R:

R: Returned to Compliance X: Non-Compliance NA: Inspected, Not Applicable ND: Inspected, Not Determined NI: Not Inspected

. .

Noncode ?: Y: Yes N: No UN: Unknown

Page 1 of 13

No 'box' is an open ended question

#### LARGE QUANTITY GENERATOR INSPECTION



#### Section 2: Manifest, Pre-Transport Requirements and Off-Site Shipments K. Hazardous waste is labeled according to applicable DOT requirements before transport. 662.031 Photo L. Hazardous waste is marked according to applicable DOT requirements before transport. 662.032(1) Photo -M. Containers of 119 gallons and less are marked with the "Hazardous Waste-Federal law 662.032(2) prohibit improper disposal" label before transport. Photo N. Placards are offered to the initial transporter. 662.033 Photo Section 3: Land Disposal Restrictions 668.07(1) A. Generator determined if each waste is prohibited from land disposal by lab analysis or generator knowledge. Photo B. Generator complies with the prohibition against dilution of wastes. 668.03 Photo \_ C. A one-time written notice was sent to each treatment, storage or disposal facility with the 668.07(1) initial waste shipment. Photo D. A new notification is sent to the TSD and maintained in the generator file when the waste or 668.07(1) receiving facility changes. Photo E. If the waste MEETS treatment standards, the LDR notice certifies wastes may be land 668.07(1) disposed without further treatment. Photo 🗌 F. If the waste EXCEEDS treatment standards, the LDR notice gives notification of 668.07(1) appropriate treatment and applicable prohibitions. Photo 🗌 G. A copy of the LDR notifications and certifications are retained for at least 3 years from the 668.07(1)(h) date the waste was last sent off-site. Photo H. Underlying hazardous constituents have been identified for characteristic wastes. 668.09(1) Photo 🗌 I. Generator identifies EITHER of the following when the waste is both a listed and 668.09(2) characterisitic waste: Photo 1. The treatment standards for the listed waste code, in lieu of the treatment standard for the characteristic waste codes. 2. The treatment standards for all applicable listed and characteristic waste codes. U. If waste is treated in containers or tanks, the generator meets BOTH of the following (NR 662.034(1)(d) 668.07(1)(e): Photo 1. Developed a written waste analysis plan describing the procedures used to meet applicable LDR treatment standards. 2. Complies with the certification requirements in NR 668.07(1)(c).

Code/Stat ?: C; Compliance CA: Compliance with Concern R: Returned to Compliance X: Non-Compliance NA: Inspected, Not Applicable ND: Inspected, Not Determined NI: Not Inspected Noncode ?: Y: Yes N: No UN: Unknown Page 2 of 13

Notes: \*: Dept. approved alternate may apply No

No 'box' is an open ended question

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### WASTE & MATERIALS MANAGEMENT PROGRAM

### LARGE QUANTITY GENERATOR INSPECTION



Secti	on 4: Annual Reports and Exception Reporting		
	A. Annual reports covering generator activities during the calendar year have been submitted	0 /	662.041
	to the Department by March 1 of the following year.	IJ	Photo _
		- j	
	B. Transporter or TSD is contacted if signed manifest is not received in 35 days.	MA	662.042(1)
		[4]	Photo _
	C. Exception report is submitted to the Department if a signed manifest is not received within	N/M	662.042(2)
	45 days.	11/1	Photo []
	D. Copy of each annual report and exception report is kept for at least 3 years from the date of		662.040(2)
	the report.	I Y	Photo
			[Pnoto]
Sect	on 5: Preparedness and Prevention		
ELECTRONIC STATE		,	Alexandra de la compania del compania del compania de la compania del compania de la compania del compania de la compania del compania
		r <b>t</b>	
	A. Generator has ALL of the following, unless the equipment is not necessary for the types of wastes handled (NR 665,0032):	IV	662.034(1)(d)
	1. Device to summon emergency assistance (e.g., telephone, 2 way radio).		Photo _
	2. Internal communications and alarm systems.		en e
	3. Portable fire extinguishers.		Land Control
	Fire control equipment, including special extinguishing equipment.     Spill control equipment.		
	6. Decontamination equipment (e.g., eyewash, shower).		
	7. Water at adequate volume and pressure to supply water spray systems.		
	B. All of the above emergency equipment is tested and maintained to assure its proper	1/	662.034(1)(d)
	operation in an emergency (NR 665.0033).	J <b>y</b>	Photo _
	C. There is immediate access to internal or external alarms or an emergency communication		662.034(1)(d)
	device in hazardous waste handling areas (NR 665.0034).	M	Photo
		_/_	d
	D. Generator has made ALL of the following arrangements with emergency organizations (NR	V	662.034(1)(d)
	665.0037):  1. Primary and support roles have been defined if multiple police and fire departments could	/	Photo
	respond to an emergency.	1	e, to see
	2. Police, fire and emergency response teams are familiar with the site layout, hazards of the	· .	+ 1 - +
	waste handled, places where personnel work, entrances and roads in the site and possible	1	
	evacuation routes.  3. Agreements are made with emergency response contractors and equipment suppliers.		
	4. Local hospitals are familiar with the properties of wastes handled and the types of injuries or	ļ	
	illnesses that could result from an emergency.	1	
	E. Aisle space provided throughout the facility to allow for the unobstructed movement of	1	662.034(1)(d)
	personnel and all emergency equipment (NR 665.0035).	<b>)</b>	Photo
		· · · · · ·	-

### Section 6: Contingency Plan and Emergency Procedures

A. Generator has a written contingency plan, amended SPCC plan or other emergency plan that will be implemented immediately in the event of a fire, explosion or hazardous waste discharge (NR 665.0051). If there is no written plan go to question 7.A.

-	. **
\ /	662.034(1)(d)
Z	Photo

### LARGE QUANTITY GENERATOR INSPECTION



### Section 6: Contingency Plan and Emergency Procedures

	·	
B. Generator has amended a SPCC plan or other emergency plan so it sufficiently	11	662.034(1)(d)
incorporates hazardous waste management provisions (NR 665.0052(2)).	J Y	Photo
	_ <b>/</b>	111000
C. Copies of the contingency plan and all revisions have been made available to police, fire,		662.034(1)(d)
hospital and emergency response teams. (NR 665.0052(3)).	X	Photo
		JEHOROL .
D. Contingency plan was amended due to ANY of the following (NR 665.0054):		662.034(1)(d)
1. Confingency plan failed in an emergency.	Y	Photo
2. Change in site design, construction, O&M, or other circumstances which affect emergency	<b>-</b>	FIIOIO
response.		
3. Emergency coordinators changed.		•
Emergency equipment changed.		
E. Contingency plan identifies an emergency coordinator who meets ALL of the following (NR	\/ .	662.034(1)(d)
665.0055):	у	Photo
Available or on call to coordinate emergency response measures.	-	<u> </u>
2. Familiar with all aspects of site activities and the contingency plan.		
Has authority to commit the resources needed to carry out the contingency plan.		1 = = = = = = = = = = = = = = = = = = =
F. Contingency plan includes ALL of the following (NR 665.0052):		662.034(1)(d)
Designation of the primary emergency coordinator, with alternates listed in the order of	У	Photo
assuming responsibility.	<b>V</b>	
2. Name, address and phone number, office and home, for each emergency coordinator.  3. Description of the arrangements agreed to by the police, fire, hospitals and emergency		
response teams to coordinate emergency services.		
4. Evacuation plan for personnel including signal(s) to be used in the event of evacuation and		
alternate routes.		
5. Actions facility personnel will take in response to a fire, explosion, or hazardous waste		
discharge.		
6. List of emergency equipment at the site, including location, description and capabilities of		
each item.		•
G. Contingency plan requires the emergency coordinator to do ALL of the following in the event	11	662.034(1)(d)
of a fire, explosion, or discharge of hazardous wastes (NR 665.0056):	У	Photo
Activate internal alarms or communication systems.	<b></b>	][11,000
Notify appropriate authorities, if their help is needed.		
3. Identify the character, source, amount, and extent of discharged hazardous materials.		
4. Assess hazards to human health and the environment.		
5. If the incident threatens human health or the environment outside the facility, notify local		
authorities that evacuation may be necessary and notify the national response center (800-424-8802) and the division of emergency government (800-943-0003).	}	
6. Take all reasonable measures necessary to ensure fires, explosions and discharges do not		•
occur, reoccur, or spread.		
7. Monitor for leaks, pressure buildup, gas generation or ruptures in valves, pipes, or other		
equipment if the site stops operation.		
8. Provide for treating, storing, or disposing of recovered waste, contaminated soil, surface		
water, or other material.		
9. Ensure wastes that are incompatible with the released material are not treated, stored or		
disposed until cleanup is completed.		
10. Ensure that emergency equipment is clean and fit for use prior to resuming operations.		
11. Notify the department and appropriate state and local authorities before resuming		
operations.		
12. Submit an incident report to the department within 15 days.	]	*
		· ·





### Section 7: Personnel Training Requirements A. Generator has a program of classroom instruction or on-the-job training for personnel in 662.034(1)(d) hazardous waste management (NR 665.0016(1)(a)). If there is no training program go to Photo question 8.A. B. Program is directed by a person trained in hazardous waste management procedures (NR 662.034(1)(d) 665.0016(1)(b)). Photo C. Program teaches facility personnel hazardous waste management procedures relevant to 662.034(1)(d) the positions in which they are employed (NR 665.0016(1)(b)). Photo D. Training program ensures personnel are able to respond effectively to emergencies by 662.034(1)(d) familiarizing them with the following applicable items (NR 665.0016(1)(c)): Photo 1. Contingency plan implementation. 2. Procedures for using, inspecting, repairing, and replacing emergency and monitoring equipment. 3. Key parameters for automatic waste feed cut-off systems. 4. Communications and alarm systems. 5. Response to fires or explosions. Response to groundwater contamination incidents. 7. Shutdown of operations. E. New employees are trained within 6 months of their assignment (NR 665.0016(2)). 662.034(1)(d) Photo F. Employees work in supervised positions until they have completed the training (NR 662.034(1)(d) 665.0016(2)). Photo G. Personnel take part in an annual review of the training (NR 665.0016(3)). 662.034(1)(d) Photo H. Generator keeps ALL of the following training documents (NR 665.0016(4)): 662.034(1)(d) 1. Job title and the employee name for each position related to hazardous waste management Photo 2. Job description for each of the above job titles. 3. Description of the amount and type of introductory and continuing training that will be given to each employee. 4. Records that required training has been given to each employee. I. Training records are maintained until closure for current personnel and at least 3 years from 662.034(1)(d) the date the employee last worked at the facility (NR 665.0016(5)). Photo Section 8: 90-Day Container Accumulation

A. Waste is accumulated in containers. If NO, go to Section 9.	11	
	X	Photo
Accumulation start date is clearly marked and visible for inspection on each container.	11/	662.034(1)(b)
	Y	Photo
C. All containers are clearly marked with the words "Hazardous Waste".	11/	662.034(1)(c)
TOTAL PART DISCUSSION AND THE PART OF THE	l Y	Photo

R: Returned to Compliance X: Non-Compliance NA: Inspected, Not Applicable ND: Inspected, Not Determined NI: Not Inspected Code/Stat ?: C: Compliance CA: Compliance with Concern

Noncode ?: Y: Yes N: No UN: Unknown

Notes: \*: Dept, approved alternate may apply No 'box' is an open ended question

Page 5 of 13 d\_report\_inspection\_print\_ff

### LARGE QUANTITY GENERATOR INSPECTION

D. If container is leaking or in poor condition, the contents are transferred to another container



### Section 8: 90-Day Container Accumulation

in good condition (NR 665.0171).

E. Containers are made of or lined with materials that are compatible with the waste (NR	\/	662.034(1)(a)1
665.0172).	У	Photo 🗌
F. Containers are kept closed, except when it is necessary to add or remove waste (NR	A 1	662.034(1)(a)1
665.0173(1)).	V	
(1)		Photo _
G. Containers are opened, handled or stored to prevent leaks or ruptures (NR 665.0173(2)).	M	662.034(1)(a)1
	<b>Y</b>	Photo _
Container storage areas are inspected weekly for leaks and deterioration (NR 665.0174).	<b>A</b> 1	662.034(1)(a)1
	V	Photo
Containers of ignitable or reactive waste are located at least 50 feet from the property line	a M	662.034(1)(a)1
NR 665.0176).	$\mathbb{W}$	Photo [
. Containers of incompatible wastes are separated or protected from each other by a physical	a/N	662.034(1)(a)1
earrier (dike, berm, wall or other device) (NR 665.0177(3)).	M	Photo _
. Incompatible wastes are stored in separate containers unless the mixing will not generate	1 m	662.034(1)(a)1
extreme heat, fire, explosion, toxic gases or other dangers (NR 665.0177(1)).	M	Photo [
Containers that previously held waste are properly washed before adding incompatible	1 M	662.034(1)(a)1
vaste, unless the mixing will not generate extreme heat, fire, explosion, toxic gases or other	IH	Photo _
dangers (NR 665.0177(2)).		
n 9: Subchapter BB Standards for Equipment Leaks		nggher ne gare and district the state of
n 9: Subchapter BB Standards for Equipment Leaks	200 98 (2	
	à I/\	
A. Generator operates any of the following equipment containing or contacting hazardous vastes with organic concentration >= 10% by weight. If NO, go to Section 10 (NR	M	Photo
A. Generator operates any of the following equipment containing or contacting hazardous wastes with organic concentration >= 10% by weight. If NO, go to Section 10 (NR 562.034(1)(a), NR 665.1050(2).	M	Photo
A. Generator operates any of the following equipment containing or contacting hazardous wastes with organic concentration >= 10% by weight. If NO, go to Section 10 (NR 662.034(1)(a), NR 665.1050(2).  I. Pumps in light liquid service.	M	Photo
A. Generator operates any of the following equipment containing or contacting hazardous wastes with organic concentration >= 10% by weight. If NO, go to Section 10 (NR 562.034(1)(a), NR 665.1050(2).  1. Pumps in light liquid service. 2. Compressors.	M	Photo _
A. Generator operates any of the following equipment containing or contacting hazardous vastes with organic concentration >= 10% by weight. If NO, go to Section 10 (NR 662.034(1)(a), NR 665.1050(2).  1. Pumps in light liquid service. 2. Compressors. 3. Pressure relief devices in gas or vapor service.	M	Photo _
A. Generator operates any of the following equipment containing or contacting hazardous wastes with organic concentration >= 10% by weight. If NO, go to Section 10 (NR 562.034(1)(a), NR 665.1050(2).  I. Pumps in light liquid service.  C. Compressors.  B. Pressure relief devices in gas or vapor service.  J. Sampling connection systems.  J. Open-ended valves or lines.	M	Photo _
A. Generator operates any of the following equipment containing or contacting hazardous wastes with organic concentration >= 10% by weight. If NO, go to Section 10 (NR 662.034(1)(a), NR 665.1050(2).  1. Pumps in light liquid service. 2. Compressors. 3. Pressure relief devices in gas or vapor service. 4. Sampling connection systems. 5. Open-ended valves or lines. 6. Valves in gas or vapor service or in light liquid service.	M	Photo
A. Generator operates any of the following equipment containing or contacting hazardous wastes with organic concentration >= 10% by weight. If NO, go to Section 10 (NR 662.034(1)(a), NR 665.1050(2).  1. Pumps in light liquid service. 2. Compressors. 3. Pressure relief devices in gas or vapor service. 4. Sampling connection systems. 5. Open-ended valves or lines. 6. Valves in gas or vapor service or in light liquid service. 7. Pumps or valves in heavy liquid service	M	Photo
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A. Generator operates any of the following equipment containing or contacting hazardous vastes with organic concentration >= 10% by weight. If NO, go to Section 10 (NR 162.034(1)(a), NR 665.1050(2).  Pumps in light liquid service.  Compressors.  Pressure relief devices in gas or vapor service.  Sampling connection systems.  Open-ended valves or lines.  Valves in gas or vapor service or in light liquid service.  Pumps or valves in heavy liquid service.  Pressure relief devices in light liquid or heavy liquid service.  Flanges or other connectors.  Equipment listed in Question 9.A. is excluded from subch. BB requirements because it is in recuum service and individually listed in the facility operating record by an identification	M	662.034(1)(a)
A. Generator operates any of the following equipment containing or contacting hazardous vastes with organic concentration >= 10% by weight. If NO, go to Section 10 (NR 562.034(1)(a), NR 665.1050(2).  1. Pumps in light liquid service.  2. Compressors.  3. Pressure relief devices in gas or vapor service.  3. Sampling connection systems.  3. Open-ended valves or lines.  3. Valves in gas or vapor service or in light liquid service.  3. Pressure relief devices in light liquid service.  3. Pressure relief devices in light liquid or heavy liquid service.  3. Equipment listed in Question 9.A. is excluded from subch. BB requirements because it is in recuum service and individually listed in the facility operating record by an identification number (NR 665.1050(4), NR 665.1064(7)(e)).	M	662.034(1)(a) Photo∐
A. Generator operates any of the following equipment containing or contacting hazardous vastes with organic concentration >= 10% by weight. If NO, go to Section 10 (NR 662.034(1)(a), NR 665.1050(2).  1. Pumps in light liquid service.  2. Compressors.  3. Pressure relief devices in gas or vapor service.  4. Sampling connection systems.  5. Open-ended valves or lines.  6. Valves in gas or vapor service or in light liquid service.  7. Pumps or valves in heavy liquid service.  8. Pressure relief devices in light liquid or heavy liquid service.  9. Flanges or other connectors.  9. Equipment listed in Question 9.A. is excluded from subch. BB requirements because it is in reacuum service and individually listed in the facility operating record by an identification number (NR 665.1050(4), NR 665.1064(7)(e)).  C. Equipment listed in Question 9.A. is excluded from subch. BB requirements because it	M	662.034(1)(a) Photo 662.034(1)(a)
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A. Generator operates any of the following equipment containing or contacting hazardous wastes with organic concentration >= 10% by weight. If NO, go to Section 10 (NR 662.034(1)(a), NR 665.1050(2).  1. Pumps in light liquid service.  2. Compressors.  3. Pressure relief devices in gas or vapor service.  4. Sampling connection systems.  5. Open-ended valves or lines.  6. Valves in gas or vapor service or in light liquid service.  7. Pumps or valves in heavy liquid service.  8. Pressure relief devices in light liquid or heavy liquid service.  9. Flanges or other connectors.  8. Equipment listed in Question 9.A. is excluded from subch. BB requirements because it is in vacuum service and individually listed in the facility operating record by an identification number (NR 665.1050(4), NR 665.1064(7)(e)).  C. Equipment listed in Question 9.A. is excluded from subch. BB requirements because it operates < 300 hours per calendar year and is identified, either by list or location (area or group), in the facility operating record. (NR 665.1050(5), NR 665.1064(7)(f)).  D. If the facility determines compliance with subch. BB by documenting compliance with Clean	MA	662.034(1)(a) Photo 662.034(1)(a)
A. Generator operates any of the following equipment containing or contacting hazardous wastes with organic concentration >= 10% by weight. If NO, go to Section 10 (NR 562.034(1)(a), NR 665.1050(2).  1. Pumps in light liquid service.  2. Compressors.  3. Pressure relief devices in gas or vapor service.  4. Sampling connection systems.  5. Open-ended valves or lines.  6. Valves in gas or vapor service or in light liquid service.  7. Pumps or valves in heavy liquid service.  8. Pressure relief devices in light liquid or heavy liquid service.  9. Flanges or other connectors.  3. Equipment listed in Question 9.A. is excluded from subch. BB requirements because it is in vacuum service and individually listed in the facility operating record by an identification number (NR 665.1050(4), NR 665.1064(7)(e)).  C. Equipment listed in Question 9.A. is excluded from subch. BB requirements because it operates < 300 hours per calendar year and is identified, either by list or location (area or group), in the facility operating record. (NR 665.1050(5), NR 665.1064(7)(f)).	MA	662.034(1)(a) Photo 662.034(1)(a) Photo

R: Returned to Compliance X: Non-Compliance NA: Inspected, Not Applicable ND: Inspected, Not Determined NI: Not Inspected Code/Stat ?: C: Compliance CA: Compliance with Concern Noncode?: Y: Yes N: No UN: Unknown

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### LARGE QUANTITY GENERATOR INSPECTION

# Section 9: Subchapter BB Standards for Equipment Leaks

E. ALL of the following information used to determine the applicability of exclusions in	MAA	662.034(1)(a)
Questions 9.B 9.D. is maintained at the facility (NR 665.1064(11)):  1. Analysis determining the design capacity of the hazardous waste management unit.  2. Statement listing the hazardous waste influent to and effluent from each hazardous waste management unit subject to subch. BB and an analysis determining whether these hazardous wastes are heavy liquids.  3. Up-to-date analysis and the supporting information used to determine whether or not equipment is subject to subch. BB.	INTI	Photo _
F. When knowledge of the nature of the hazardous waste stream or the process by which it was produced is used to determine the applicability of the exclusions, supporting documentation such as the following are maintained at the facility (NR 665.1064(11)):  1. Information that the production process does not use organic compounds.  2. The process is identical to a process at another facility where the total organic content was measured at <10%.  3. The process has not changed to affect the total organic concentration of the waste.  G. The facility keeps records of new determinations performed when there are any changes	MA	662.034(1)(a) Photo  662.034(1)(a)
that could result in an increase in the total organic content of the waste in contact with equipment that is not subject to subch. BB requirements (NR 665.1064(11)).	M	Photo _
H. All equipment stated in Question 9.A. is excluded from additional subch. BB requirements. If NO, complete the subch. BB inspection form.	M	Photo _
on 10: Subchapter CC Level 1 Container Standards	1401-	
A TI S III I I I I I I I I I I I I I I I	Fa 62	
A. The facility manages hazardous waste in containers with EITHER of the following design capacities. If NO, go to Question 10.R. (NR 665.1087(2)(a), NR 662.034(1)(a)1).  1. Between 26 and 119 gallons.  2. Greater than 119 gallons and not in light material service.  B. Containers are exempt from CC regulation because of ALL of the following (NR 662.034(1)(a)1, NR 665.1083(3)(a), NR 665.1084(1)(a)1, NR 665.1083(3)(a), NR	M	Photo D
capacities. If NO, go to Question 10.R. (NR 665.1087(2)(a), NR 662.034(1)(a)1).  1. Between 26 and 119 gallons.  2. Greater than 119 gallons and not in light material service.  B. Containers are exempt from CC regulation because of ALL of the following (NR 662.034(1)(a)1, NR 665.1083(3)(a), NR 665.1084(1)(a)1, NR 665.1083(3)(a), NR 665.1084(1)(a)2., NR 665.1084(1)(b)):  1. The average VO concentration at the point of origination is <500 ppmw for all hazardous waste entering the container.  2. The initial determination of the average VO concentration for the waste stream was made before the material was placed in the container.  3. The initial determination is reviewed and updated at least once every 12 months.  4. A new waste determination is performed whenever changes to the source generating the waste stream likely causes the average VO concentration to increase to >= 500 ppmw.  5. The average VO concentration is determined by direct measurement or by knowledge.  Note: See NR 665.1084(1)(c) for direct measurement procedures and NR 665.1084(1)(d) for using knowledge.	M	Photo Photo
capacities. If NO, go to Question 10.R. (NR 665.1087(2)(a), NR 662.034(1)(a)1).  1. Between 26 and 119 gallons.  2. Greater than 119 gallons and not in light material service.  B. Containers are exempt from CC regulation because of ALL of the following (NR 662.034(1)(a)1, NR 665.1083(3)(a), NR 665.1084(1)(a)1, NR 665.1083(3)(a), NR 665.1084(1)(a)2., NR 665.1084(1)(b)):  1. The average VO concentration at the point of origination is <500 ppmw for all hazardous waste entering the container.  2. The initial determination of the average VO concentration for the waste stream was made before the material was placed in the container.  3. The initial determination is reviewed and updated at least once every 12 months.  4. A new waste determination is performed whenever changes to the source generating the waste stream likely causes the average VO concentration to increase to >= 500 ppmw.  5. The average VO concentration is determined by direct measurement or by knowledge.  Note: See NR 665.1084(1)(c) for direct measurement procedures and NR 665.1084(1)(d) for using knowledge.  C. For each waste determination, the date, time, and location of each waste sample collected	M	E SPECIAL
capacities. If NO, go to Question 10.R. (NR 665.1087(2)(a), NR 662.034(1)(a)1).  1. Between 26 and 119 gallons.  2. Greater than 119 gallons and not in light material service.  B. Containers are exempt from CC regulation because of ALL of the following (NR 662.034(1)(a)1, NR 665.1083(3)(a), NR 665.1084(1)(a)1, NR 665.1083(3)(a), NR 665.1084(1)(a)2., NR 665.1084(1)(b):  1. The average VO concentration at the point of origination is <500 ppmw for all hazardous waste entering the container.  2. The initial determination of the average VO concentration for the waste stream was made before the material was placed in the container.  3. The initial determination is reviewed and updated at least once every 12 months.  4. A new waste determination is performed whenever changes to the source generating the waste stream likely causes the average VO concentration to increase to >= 500 ppmw.  5. The average VO concentration is determined by direct measurement or by knowledge.  Note: See NR 665.1084(1)(c) for direct measurement procedures and NR 665.1084(1)(d) for using knowledge.  C. For each waste determination, the date, time, and location of each waste sample collected are maintained in the facility records (NR 665.1090(6)(a)).  D. Containers are excluded from subch. CC because they are used to store or treat hazardous waste from organic peroxide manufacturing processes (NR 662.034(1)(a)1, NR 665.1080(4)).	M	Photo
capacities. If NO, go to Question 10.R. (NR 665.1087(2)(a), NR 662.034(1)(a)1).  1. Between 26 and 119 gallons.  2. Greater than 119 gallons and not in light material service.  B. Containers are exempt from CC regulation because of ALL of the following (NR		Photo Bell Bell Bell Bell Bell Bell Bell Bel

# LARGE QUANTITY GENERATOR INSPECTION Revision: 03/19/2012 WASTE & MATERIALS MANAGEMENT PROGRAM

Section 10: Subchapter CC Level 1 Container Standards

F. Containers are excluded from subch. CC because BOTH of the following are met (NR	h M	
665.1080(2), NR 665.1090.(10)):		Photo
1. They are equipped with air emission controls operated in accordance with the Clean Air Act	L	I Hoto[
requirements.		
2. Facility records include certification of such by the owner or operator and the specific air		
program compliance requirements for the containers	30 A	
G. All containers are excluded from subch. CC Level 1 standards. If YES, go to Question 10.R.	MA	
IU.N.	W	Photo
H. Any of the following controls are used on all Level 1 containers (NR 665.1087(3)(a)):	A #1	662.034(1)(a)1
1. Container meets applicable US DOT packaging requirements.	M	r
A cover and closure devices form a continuous barrier over the container openings such that	17/1	Photo
when they are secured, there are no visible holes, gaps or other open spaces into the		
container.		
3. An organic-vapor suppressing barrier is placed on or over the hazardous waste in an		
open-top container so that the hazardous waste is not exposed to the atmosphere.	· .	
No. 1 de la companya		
Note: Level 1 standards do not apply to satellite accumulation or RCRA empty containers.	] 	DCD 004(4)(-)4
I. If Level 1 containers do not meet applicable US DOT packaging requirements, they are	IN D	662.034(1)(a)1
equipped with covers and closure devices composed of suitable materials that minimize exposure of hazardous waste to the atmosphere and maintain integrity of the covers and	IWI	Photo 🗌
ciosure devices (NR 665.1087(3)(b)).		
J. If a Level 1 container is filled to the final level in one continuous operation, the closure		662.034(1)(a)1
device is promptly secured in the closed position when the filling operation is concluded (NR	M	
665.1087(3)(c)1.a).		Photo
K. If a Level 1 container is batch filled, the closure device is promptly secured in a closed	54 A	662.034(1)(a)1
position when the container is filled to the intended final level OR the batch loading is	l Mk	Photo
completed and any of the following first occurs (NR 665.1087(3)(c)1.b):	1 el 1/	FIIOLO
1. No additional material will be added within 15 minutes.		•
2. The person performing the loading operation leaves the immediate vicinity of the container.		•
3. The process generating the waste shuts down.		
L. If a Level 1 container is opened to remove hazardous waste, the closure device is secured	M A	662.034(1)(a)1
in the closed position upon completion of a batch removal AND when either of the following	I I M	
first occurs (NR 665.1087(3)(c)2b):		Photo
1. No additional materials will be removed within 15 minutes.		
The person removing the waste leaves the immediate vicinity of the container.		
M. If access to the inside of a Level 1 container is needed to perform routine activities other	IAA	662.034(1)(a)1
than the transfer of hazardous waste (e.g., sampling), the closure device is secured in the	M	Photo
closed position promptly after completing the activity (NR 665.1087(3)(c)3).	1 1	
N. If a Level 1 container is equipped with a pressure relief device that vents to the	IND.	662.034(1)(a)1
atmosphere, ALL of the following conditions are met (NR 665.1087(3)(c)4):	M	Photo
1. The device is designed to operate with no detectable organic emissions (< 500 ppmv) when		
in the closed position.  2. The device is closed when the internal pressure is within the specified operating range.		•
3. The device opens and vents to the atmosphere only for the purpose of maintaining internal		
pressure according to the design specifications.		
O. Safety valves are only opened to avoid an unsafe condition (NR 665.1087(3)(c)5).	1 /	662.034(1)(a)1
	11/1	
	MAIA	Photo 🗌
P. When a defect is detected, initial repair efforts are made within 24 hours of detection and	A M	662.034(1)(a)1
completed within 5 calendar days (NR 665.1087(3)(d)3).	IIVA	Photo
	8 0 2 1	

Code/Stat ? : C: Compliance CA: Compliance with Concern R: Refurmed to Compliance X: Non-Compliance NA: Inspected, Not Applicable ND: Inspected, Not Determined NI: Not Inspected Noncode ? : Y: Yes N: No UN: Unknown Page 8 of 13

Notes: \*: Dept. approved alternate may apply

# WASTE & MATERIALS MANAGEMENT PROGRAM

### LARGE QUANTITY GENERATOR INSPECTION

### Section 10: Subchapter CC Level 1 Container Standards

Q. If repairs cannot be completed in 5 days of detecting the defect, the waste is removed from	M	662.034(1)(a)
the container which is not used until it is repaired (NR 665.1087(3)(d)3).	IM	Photo
n 11: Subchapter CC Level 2 Container Standards		
1711. Gabellapter Go Level 2 Goldamer Gallaga Go		restori encompositioner
Security and the contract of t		
A. The facility manages hazardous waste containers with a design capacity >119 gallons that	M	
are in light material service. If NO, go to Section 12.		Photo
B. Any of the following controls are used on Level 2 containers: (NR 665.1087(4)(a))		662.034(1)(a)2
<ol> <li>Container meets applicable US DOT packaging requirements.</li> <li>Each potential leak interface where organic vapor leakage could occur on the container,</li> </ol>		Photo _
cover and closure device has been checked to determine that no detectable organic emissions (< 500 ppmv) are occurring.  3. The facility has demonstrated within the last 12 months that the containers are vapor-tight using Method 27 in appendix A of 40 CFR part 60.		
C. If the potential leak interface on the containers were checked, BOTH of the following were		662.034(1)(a)2
met: (NR 665.1087(4)(a))  1. Checks were made on the interface of the cover rim and the container wall; the periphery of		Photo _
any opening on the container or container cover and its associated closure device; and, the sealing seat interface on a spring-loaded, pressure-relief valve.  2. The test was performed when the container was filled with a material having a VO concentration representative of the hazardous waste expected to be stored in the container.		A Part of A Service Post Service Post Service B
D. The facility maintains a copy of the procedure used to determine that containers >119	2 -	662.034(1)(a)
gallons in size that do not meet DOT requirements are not managing hazardous waste in light material service. (NR 665.1087(3)(e))		Photo _
E. Level 2 controls are used when transferring waste in or out of the container that minimize		662.034(1)(a)
exposure to the atmosphere (submerged-fill pipe, vapor-recovery system, etc.) to the extent practical, considering the physical properties of the hazardous waste and good engineering		Photo _
and safety practices. (NR 665.1087(4)(b))  F. If the container is filled to the final level in one continuous operation, the closure devices are		662.034(1)(a)
promptly secured in the closed position when the filling operation is concluded. (NR 665.1087(4)(c)1.a.)	an alm	Photo _
G. If the container is batch filled, the closure devices are promptly secured in a closed position	10	662.034(1)(a)
upon filling the container to the intended final level, or when the batch loading is completed and ANY of the following first occurs: (NR 665.1087(4)(c)1.b.)		Photo
<ol> <li>No additional material will be added within 15 minutes.</li> <li>The person performing the loading operation leaves the immediate vicinity of the container.</li> <li>The process generating the waste shuts down.</li> </ol>		
H. If containers are opened to remove hazardous waste, closure devices are secured in the		662.034(1)(a)
closed position upon completion of a batch removal and either of the following first occurs: (NR 665.1087(4)(c)2.b.)		Photo _
No additional materials will be removed within 15 minutes.     The person removing the waste leaves the immediate vicinity of the container.	-	
I. If access to the inside of the container is needed to perform routine activities other than the	1	662.034(1)(a)
transfer of hazardous waste (e.g., sampling), the closure device is secured in the closed		Photo

Code/Stat ?: C: Compliance CA: Compliance with Concern R: Returned to Compliance X: Non-Compliance NA: Inspected, Not Applicable ND: Inspected, Not Determined NI: Not Inspected

Noncode ?: Y: Yes N: No UN: Unknown

Page 9 of 13

### LARGE QUANTITY GENERATOR INSPECTION



### Section 11: Subchapter CC Level 2 Container Standards

<ul> <li>J. If the container is equipped with a pressure relief device that vents to the atmosphere, the device meets ALL of the following conditions: (NR 665.1087(4)(c)4.)</li> <li>1. Designed to operate with no detectable organic emissions when in the closed position.</li> <li>2. Closed when the internal pressure is within the specified operating range.</li> <li>3. Opens and vents to the atmosphere only for the purpose of maintaining internal pressure according to the design specifications.</li> </ul>	M	662.034(1)(a)2 Photo
K. Safety valves are only opened to avoid an unsafe condition. (NR 665.1087(4)(c)5.)	i/f	662.034(1)(a)2
L. When a defect is detected, initial repair efforts are made within 24 hours of detection. (NR 665.1087(4)(d)3.)	M	662.034(1)(a)2
M. Repairs are completed within 5 days, or the waste is removed from the container which is not used until the defect is repaired. (NR 665.1087(4)(d)3.)	M	662.034(1)(a)2
Section 12: Subchapter CC Level 3 Container Standards	VI. 10	
A. The facility manages hazardous waste in containers having a design capacity >26 gallons during a waste stabilization process when hazardous waste is exposed to the atmosphere. If NO, go to Section 13.	M	Photo
B. The container is vented directly through a closed-vent system to a control device, or the container is vented inside an enclosure which is exhausted through a closed-vent system to a control device. (NR 665.1087(5)(a))		662.034(1)(a)2 Photo
C. If the container is vented inside an enclosure, the enclosure is operated according to the criteria for permanent total enclosures found in Method 204 in appendix M of 40 CFR part 51. (NR 665.1087(5)(b)1.)		662.034(1)(a)2
D. Records for the most recent set of calculations and measurements verifying the enclosure meets the criteria for a permanent total enclosure in Method 204 in appendix M of 40 CFR part 51 are maintained at the facility. (NR 665.1090(4)(a))		662.034(1)(a)2 Photo
E. Level 3 controls are used when wastes are transferred in or out of the container that minimize exposure to the atmosphere (e.g., submerged-fill pipe, vapor-recovery system, etc.) to the extent practical, considering the physical properties of the hazardous waste and good engineering and safety practices. (NR 665.1087(5)(f))	W	662.034(1)(a)2
Section 13: Satellite Accumulation	187111	
	_	and and the same street of optimization of the process of the same states and an additional states and states
A. Waste is accumulated in satellite accumulation areas. If NO, go to Section 14.	Y	Photo _
B. Generator accumulates no more than 55 gallons of hazardous waste or 1 quart of acute hazardous waste in each satellite area.	y	662.034(3)(a)
C. Satellite containers are under the control of the operator of the process generating the waste.	y	662.034(3)(a) Photo
D. Containers are made of or lined with materials that are compatible with the waste (NR 665.0172).	M	662.034(3)(a)1

Code/Stat ?: C: Compliance CA: Compliance with Concern R: Returned to Compliance X: Non-Compliance NA: Inspected, Not Applicable ND: Inspected, Not Determined NI: Not Inspected Noncode ?: Y: Yes N: No UN: Unknown Page 10 of 13

Notes: \*; Dept. approved alternate may apply

No 'box' is an open ended question

Page 10 of 13 d\_report\_inspection\_print\_ff

# LARGE QUANTITY GENERATOR INSPECTION



MANAGEMENT PROGR	AM
Section 13: S	Satellite Accumulation

F. Containers are kept closed except when it is necessary to add or remove waste (NR  665.0173(1)).  G. Containers are marked "Hazardous Waste" or with other words that identify the contents.  H. Container holding the excess waste is marked with the date the excess amount begins accumulating.  H. Container holding the excess waste is marked with the date the excess amount begins accumulating.  H. Generator complies with the 90 day accumulation requirements with respect to the excess amount within 3 days of it being generated.  M. Generator includes waste minimization  A. Generator includes waste minimization information in the annual report.  B. Generator has a program in place to reduce the volume or quantity and toxicity of waste to an economically practicable degree.  Note: The inspector should look for evidence justifying the generator's waste minimization certification on the manifest. Also, EPA guidance recommends that the generator have a written waste minimization/pollution prevention plan.  In 15: Used Oil			
Photo □  F. Containers are kept closed except when it is necessary to add or remove waste (NR	E. If a container is leaking or in poor condition, the contents are transferred to another	11	662.034(3)(a)1
F. Containers are kept closed except when it is necessary to add or remove waste (NR   Fhoto   Photo   Photo   Photo	container in good condition (NR 665.0171).	IM	
Photo		a el n	1
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F. Used automotive oil filters and oil absorbent material are not land filled, except if less than 1	an economically practicable degree.  Note: The inspector should look for evidence justifying the generator's waste minimization certification on the manifest. Also, EPA guidance recommends that the generator have a written waste minimization/pollution prevention plan.  In 15: Used Oil  A. Used oil is managed on-site. If NO, go to Section 16  B. Used oil containing >= 1,000 ppm halogens is managed as listed hazardous waste or the rebuttable presumption requirements have been met.  C. Used oil containers and tanks are in good condition and not leaking.  D. Used oil containers and tanks are marked "used oil".		Photo
F. Used automotive oil filters and oil absorbent material are not land filled, except if less than 1	an economically practicable degree.  Note: The inspector should look for evidence justifying the generator's waste minimization certification on the manifest. Also, EPA guidance recommends that the generator have a written waste minimization/pollution prevention plan.  on 15: Used Oil  A. Used oil is managed on-site. If NO, go to Section 16  B. Used oil containing >= 1,000 ppm halogens is managed as listed hazardous waste or the rebuttable presumption requirements have been met.  C. Used oil containers and tanks are in good condition and not leaking.  D. Used oil containers and tanks are marked "used oil".	INA IA III	Photo   Photo
all and the set we will be from a new routing on ill	an economically practicable degree.  Note: The inspector should look for evidence justifying the generator's waste minimization certification on the manifest. Also, EPA guidance recommends that the generator have a written waste minimization/pollution prevention plan.  In 15: Used Oil  A. Used oil is managed on-site. If NO, go to Section 16  B. Used oil containing >= 1,000 ppm halogens is managed as listed hazardous waste or the rebuttable presumption requirements have been met.  C. Used oil containers and tanks are in good condition and not leaking.  D. Used oil containers and tanks are marked "used oil".  E. Transporter has an EPA ID number, except when generator self-transports or has a tolling		Photo Photo Photo 679.10(2)(a)2 Photo 679.22(2) Photo 679.22(3)(a) Photo 679.24
gallon absorbent results from a non-routine spill.	an economically practicable degree.  Note: The inspector should look for evidence justifying the generator's waste minimization certification on the manifest. Also, EPA guidance recommends that the generator have a written waste minimization/pollution prevention plan.  In 15: Used Oil  A. Used oil is managed on-site. If NO, go to Section 16  B. Used oil containing >= 1,000 ppm halogens is managed as listed hazardous waste or the rebuttable presumption requirements have been met.  C. Used oil containers and tanks are in good condition and not leaking.  D. Used oil containers and tanks are marked "used oil".  E. Transporter has an EPA ID number, except when generator self-transports or has a tolling	INA IMA III	Photo   Photo
	an economically practicable degree.  Note: The inspector should look for evidence justifying the generator's waste minimization certification on the manifest. Also, EPA guidance recommends that the generator have a written waste minimization/pollution prevention plan.  Don 15: Used Oil  A. Used oil is managed on-site. If NO, go to Section 16  B. Used oil containing >= 1,000 ppm halogens is managed as listed hazardous waste or the rebuttable presumption requirements have been met.  C. Used oil containers and tanks are in good condition and not leaking.  D. Used oil containers and tanks are marked "used oil".  E. Transporter has an EPA ID number, except when generator self-transports or has a tolling agreement.  F. Used automotive oil filters and oil absorbent material are not land filled, except if less than 1		Photo

Code/Stat ?: C: Compliance CA; Compliance with Concern No. R: Returned to Compliance X: Non-Compliance NA: Inspected, Not Applicable ND: Inspected, Not Determined NI: Not Inspected Noncode ?: Y: Yes N: No UN: Unknown Page 11 of 13

Notes: \*: Dept. approved alternate may apply No 'box' is an open ended question

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# VESOTES, DESCRIBED PER OF NOTIFICAL RESIDENCE PE

### LARGE QUANTITY GENERATOR INSPECTION

### Section 15: Used Oil

G. If used oil is burned in an on-site used oil-fired space heater, all of the following are met:	MA	679.23
<ol> <li>Only used oil from the generator or household do-it-yourselfers is burned.</li> </ol>		Photo
2. The heater is designed with a maximum capacity of 0.5 million of 0 per flodi of 1035.		THOO
The combustion gases are vented to the ambient air.	]	_
	T	

H. If used oil is accepted from others or sent off-site to be burned in a space heater, the used oil meets fuel specifications and the marketer requirements in NR 679 subch. H are met.

N //	679.11	
 IVI	Photo _	

### Section 16: F006 Wastewater Treatment Sludge

		-	<u></u>
A. Generator accumulates F006 sludge for more than 90 days. If NO, go to Section 17.	n/		
	11		Photo _
B. The F006 waste is accumulated for no more than 180 days, unless the waste is shipped 200	ĺ	:	662.034(7)
miles or more.			Photo _
C. Pollution prevention practices are in place to reduce the amount of contaminants entering			662.034(7)(a)
the F006 waste.	_		Photo _
D. The F006 waste is legitimately recycled through metals recovery.			662.034(7)(b)
			Photo _
E. No more than 20,000 kg (44,100 lbs) of F006 waste is accumulated on-site.			662.034(7)(c)
			Photo
F. Accumulation containers meet subch. I, AA, BB and CC standards in ch. NR 665.			662.034(7)(d)1.a
			Photo _
G. The accumulation start date is clearly marked and visible for inspection on each container.			662.034(7)(d)3
			Photo _
H. Accumulation tanks meet subch. J, AA, BB and CC standards in ch. NR 665, except for NR			662.034(7)(d)1.b
665.0197(3) and NR 665.0200.			Photo _
Each container and tank of F006 waste is clearly marked with the words "Hazardous			662.034(7)(d)4
Waste".			Photo
J. A containment building used for accumulation meets subch. DD standards in ch. NR 665; a	1		662.034(7)(d)1.c
P.E. certification stating compliance with the design standards is in the operating record AND written procedures and documentation for emptying the unit within 180 days are on file.			Photo
K. The accumulation of F006 waste is included in the preparedness and prevention			662.034(7)(d)5
procedures, contingency plan and personnel training program.			Photo .
L. If waste is accumulated for up to 270 days, the generator must ship the waste over 200	1	)	662.034(8)
miles for metals recovery.	V		Photo

Code/Stat ?: C: Compliance CA: Compliance with Concern R: Returned to Compliance X: Non-Compliance NA: Inspected, Not Applicable ND: Inspected, Not Determined NI: Not Inspected Noncode ?: Y: Yes N: No UN: Unknown Page 12 of 13

Notes: \*: Dept. approved alternate may apply No

No 'box' is an open ended question

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### LARGE QUANTITY GENERATOR INSPECTION



### Section 17: Generator Status Evaluation

A. Waste is accumulated for less than 90 days, except as allowed in Sections 13 and 16.	\/	662.034(1)
	X	Photo _
B. More than 2,205 lbs. of non-acute hazardous waste; 2.2 lbs. of acute hazardous waste; or,	1/	
220 lbs. of residue from cleanup of an acute hazardous waste spill is generated in any month (NR 662.190(1), NR 662.220(4)).	X	Photo _
C. Describe other activities that the generator conducts at the facility (accumulation in tanks,	Mr	
recycling, 10-day transfer, transporter, used oil, treatment, storage, disposal, universal waste, etc.).	M	Photo [
D. If waste was previously accumulated in a tank system, the generator performed EITHER of	1.1	662.034(1)(a)2
the following (NR 665.0197(1), NR 665.0197(2)): 1. Closure by removing or decontaminating waste residues, contaminated containment system	M	Photo
components, soils, structures and equipment.		
2. Initiated long-term care if all contaminated soils cannot be practicably removed or		
decontaminated.	• .	

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# ATTACHMENT D

# Trent Tube Plant#1 Documentation Log

WID006097281

# Attachment D- Trent Tube Plant No. 1 Inspection Documentation Log WID006097281

# Inspection Date: February 13, 2013 Submission Date: February 25, 2013 and May 10, 2013

Document Description
Confirmation of Acceptability of Free Product to EQ Resources Recovery Inc
Hazardous Manifest# 001686500 GBF
LDR Restriction Notification Form for Manifest# 001686500GBF
Hazardous Waste Profile for PPE w/Trace Contamination
Hazardous Waste Report Certification 2012
Hazardous Waste Training Certificates
Health and Safety Training Record Feb 2013
Analytical Report for Free Product
Preliminary Report of Test Results for Halogenated Solvent
Hazardous Waste Profile for Vinyl Chloride Contaminate Sludge
2011 Comprehensive Biennial Report
Hazardous Manifest# 008434418JJK
Hazardous Manifest# 001549988GBF
Hazardous Manifest #002684052JJK
Hazardous Waste Annual Report Records for Selected Generator 02/05/2013
LDR Restriction Notification Form F001, F002, U226, U228 7-23/01
Hazardous Waste Report Certification 2010
Hazardous Manifest# 003067839JJK
Hazardous Manifest# 003067836JJK
Hazardous Manifest# 003067840JJK
Hazardous Manifest# 003067841JJK
Hazardous Manifest# 003067915JJK
Hazardous Manifest# 002684092JJK
Hazardous Waste Report Certification 2011
Hazardous Manifest# 003067844JJK
Hazardous Manifest# 008434418JJK
Hazardous Manifest# 002684052JJK
Hazardous Manifest# 003067843JJK
Hazardous Manifest# 001549988GBF
Updated pages for Contingency Plan

# ATTACHMENT E Trent Tube Plant#1 Post-Inspection Log WID006097281

# Attachment E- Trent Tube Plant No. 1 Post-Inspection Documentation Log WID006097281

Inspection Date: February 12, 2013 Submission Date: May 2013

Description	37
LDR Restriction Notification Form for Manifest# 001686500GBF	
Re-evaluation of Free Product	
Hazardous Waste Report Data TTR RY2012	
Crucible Materials Corporation Environmental Response Trust	
Corrected Hazardous Waste Label	
Hazardous Waste Report 2012	

	•
•	
. *	

02/05/2013 Page 1 of 9

ټ No. 1348 EPA ID: WID006097281

Contact Person: TINA REESE, CONSULTANT

FID: 265005510

Facility Name: TRENT TUBE PLANT 1

6737 W WASHINGTON ST STE 3440

SIC Code: 3317

Location Address: 2188 CHURCH ST

WESTALLIS, WI 53214-

County: WALWORTH

EAST TROY, WI 53120-

Phone: (414) 291-8840 ext; 1105

Activity

License Number

Expiration Date

201 HW Generator - Large

297 Hazardous Waste Report Certifier

298 Hazardous Waste Report Preparer

007863229JJK Shipped: 09/19/2012

COPY 3

DNR Received: 10/05/2012

Batch/Seq: 1725 / 812

Received: 09/21/2012

TSD EPA ID: PAD987270725

TSD Facilty Name: ENVIROTROL INC

Transporter EPA ID	Transporter Name	Transporter Date	
PAD980707442	WEAVERTOWN TRANSPORT LEASING INC	09/19/2012	

Page No. Line No.

Waste Code/Description

Amount Shipped/Unit

Lbs Shipped

F001- SPENT HALO SQLVENTS USED IN DEGREASING

1000 P

1,000

1,376

Manifest Lbs. Total 1,000

001686500GBF Shipped: 05/22/2012

COPY 3

DNR Received: 06/12/2012

Batch/Seg: 1689 / 32

Received: 05/22/2012

TSD EPA ID: WID988580056

TSD Facilty Name: BADGER DISPOSAL OF WI INC

Transporter EPA ID	Transporter Name	Transporter Date
WID988580056	BADGER DISPOSAL OF WI INC	05/22/2012

Page No.	Lina No.	Waste Code/Description	Amount Shipped/Unit	Lbs Shipped
1	2	D043- VINYL CHLORIDE	55 G	459
1	1	F001- SPENT HALO SOLVENTS USED IN DEGREASING	110 G	917

Manifest Lbs. Total

State of Wisconsin Department of Natural Resources

Report Year 2004

Gen. Cat: LQG

Total Lbs Generated:

IC

FW

3:43PM

2013

2

# HAZARDOUS WASTE ANNUAL REPORT RECORDS FOR SELECTED GENERATOR

02/05/2013 Page 3 of 3

EPA ID: WID:006097281
Facility Name: TRENT TUBE PLANT 1
Location Address:2188 CHURCH ST

Stor. Code: NO LIC. STOR.

82,793

Contact Person: TINA REESE, CONSULTANT

6737 W WASHINGTON ST STE 3440

WEST ALLIS, WI 53214

FID: 265005510 County: WALWORTH

Lic. Ex. TDR: NONE, NO PLANS TO DEV.

Lbs HHHW: 0

Net Lbs Subject To Fee:

EAST TROY, WI 53120 Phone: (414) 291-8840 ext 1105

Lbs Recycled: 16,113 Lbs Leachate: 0

кероі іс	t Year 2005 Gen. Cat: LQG	Stor. Ci	ode:NO L	C. STOR.	L	ic. TDR: NONE, N	10 P	LANS TO DE	V. Lle	c. Ex. TDR: NONE, NO PLANS	S TO DEV.	SIC/NAICS C	ode: 33121
FW	Total Lbs Generated:	13,113		s Recycled: 8,213	Lbs Lea	achate: 0		Lbs Repaired	: 4,900	Lbs HHHW: 0	Net Lbs Sul	bject To Fee:	0
G₩	F001 PERSONAL PROT	ECTIVI 1,300		IENT (PPE)/FILTER LBS Generaled: 1		LBS Shipped:	1,60	A company of the company		pe: Macro-encapsulation prior c: MID000724831	to disposal a	t aπother site	
GM	F001 FREE PRODUCT Amount Generated:	165	GAL	LBS Generaled: 2	20	LBS Shippad:	20	_	-	pe: Fuel blending prior to energy: JAID060975844	gy recovery a	at another site	
GM	F001 SPENT GRANULA Amount Generated:	R ACT 6,200		ARBON LBS Generated: 6	5,200	LBS Shipped:	7,85			rpe: Other recovery or reclamate: AZD982441263	tion for reuse	inclacid regen	eration,
GM <sup>1</sup>	FD01 SYSTEM SLUDGI Amount Generated:	3,600	LBS	LBS Generated: (	3,600	LBS Shipped:	3,60			/pe: Stabilization or chemical fi o: MID000724831	bration prior t	o disposal at an	ather site

IC FVV	Gen, Cat LQG Total Lbs Generated:	Stor. Code: 1 41,692	NO LIC. STOR. Lbs Recycled: 11,692 Lb	`Lic. TDR: NONE, i s Leachate: 0	TO DEV. Lic. I tepaired: 30,000	Ex, TDR: NONE, NO Lbs HHHW: 0		SIC/NAICS Code oject To Fee: 0	
GM	F001 PERSONAL PRO Amount Generated:	TECTIVE EQ 600 LBS	UIPMENT (PPE)/FILTERS LBS Generated: 600	LBS Shipped:		: Macro-encapsulation MID000724831	n prior to disposal a	t another site	
GM	F001 FREE PRODUCT Amount Generated;	110 GAI	LBS Generated: 13	LBS Shipped:		: Fuel blanding prior t MID060975844	o eusidā iedoveiā s	at another site	
GM	F001 SPENT GRANUL Amount Generated:	AR ACTIVATI 10,350 LBS		0 LBS Shipped:		s; Other recovery of re AZD982441263	eclamation for reuse	a Incliacid regenerat	tion,
GM	F001 SYSTEM SLUDG Amount Generated:	E. 29,400 LBS	LBS Generated: 29,40	0 LBS Shipped;		e: Stabilization or cher MID000724831	mical fixation prior t	o disposal at anothe	er sib

Lic. TDR: NONE, NO PLANS TO DEV.

Lbs Repaired: 66,680

02/05/2013 Page 2 of 9

DNR Received: 04/11/2012 Batch/Seq: 1633 / 637 008337137JJK Shipped: 03/14/2012 COPY 3 Received: 03/16/2012 TSD Facilty Name: ENVIROTROL INC TSD EPA ID: PAD987270725 ٠. Transporter Name Transporter Date Transporter EPA ID 03/14/2012 WEAVERTOWN TRANSPORT LEASING INC PAD980707442 Amount Shipped/Unit Lbs Shipped Waste Code/Description Page No. Line No. 4,000 FOO1- SPENT HALO SOLVENTS USED IN DEGREASING 4000 P 4,000 Manifest Lbs. Total Batch/Seq: 1553 / 136 DNR Received: 01/06/2012 002684049JJK Shipped: 11/30/2011 COPY 3 Received: 12/02/2011 TSD EPA ID: PAD987270725 TSD Facilty Name; ENVIROTROL INC Transporter EPA ID Transporter Name Transporter Date SIEMENS INDUSTRY INC 11/30/2011 ILD982612798 Lbs Shipped Amount Shipped/Unit Page No. Line No. Waste Code/Description 1,500 F001- SPENT HALO SOLVENTS USED IN DEGREASING 1500 P 1.500 Manifest Lbs, Total

002584052JJK Shipped: 09/23/2011

COPY 3

DNR Received: 12/30/2011

Batch/Seq: 1551 / 54

Received: 09/29/2011

TSD EPA ID: PAD987270725

TSD Facilty Name: ENVIROTROL INC

Transporter EPA ID	Transporter Name	 Transporter Date
PAD981739188	SIEMENS WATER TECH CORP	 09/23/2011
PAD980707442	WEAVERTOWN TRANSPORT LEASING INC	09/27/2011

Page No. Line No.

Waste Code/Description

Amount Shipped/Unit

Lbs Shipped

F001- SPENT HALO SOLVENTS USED IN DEGREASING

2000 P Manifest Lbs. Total 2,000

2,000



02/05/2013 Page 3 of 9

No. 1348 P. 20

001549988GBF Shipped: 08/29/2011 DNR Received: 09/12/2011 Batch/Seq: 1484 / 188 Received: 08/30/2011 TSD Facility Name: BADGER DISPOSAL OF WILING TSD EPA ID: WID988580056 Transporter EPA ID Transporter Name Transporter Date WID988580056 BADGER DISPOSAL OF WILING 08/29/2011 Page No. Line No. Waste Code/Description Amount Shipped/Unit Lbs Shìpped F001- SPENT HALD SOLVENTS USED IN DEGREASING 55 G 459 Manifest Lbs. Total 459 render ig de fan y transcollection 008434418JJK Shipped: 03/10/2011 DNR Received: p4/05/2011 Batch/Seq: 1360 / 238 COPY 3 Received: 03/15/2011 TSD EPA ID: WID988580056 TSD Facilty Name: BADGER DISPOSAL OF WI INC Transporter EPA ID Transporter Name Transporter Date Wt0000815381 ADVANCED WASTE SERV INC - ADV. WASTE CARRIER 03/11/2011 Page No. Line No. Waste Code/Description Amount Shipped/Unit Lbs Shipped D043- VINYL CHLORIDE 165 G 1,376 Manifest Lbs. Total 1,376 INCLUSED NO SECONDARM DOPANAVAILE BUE 002684092JJK Shipped: 12/14/2010 DNR Received: 01/11/2011 COPY 3 Batch/Seq: 1302 / 1030 Received: 12/15/2010 TSD EPA ID: PAD987270725 TSD Facility Name: ENVIROTROL INC Transporter EPA ID Transporter Name Transporter Date PAD981739188 SIEMENS WATER TECH CORP 12/14/2010 Page No. Line No. Waste Code/Description Amount Shipped/Unit Lbs Shipped F001- SPENT HALO SOLVENTS USED IN DEGREASING 3000 P 3,000 Manifest Lbs. Total 3,000

489 VIII.

### State of Wisconsin Department of Natural Resources

# HAZARDOUS WASTE MANIFEST RECORDS FOR SELECTED GENERATOR SHIPPED BETWEEN 01/01/2008 AND 02/04/2013

Received: 08/25/2010   TSD EPA ID: AZD882441283   TSD Facilty Name: WESTATES CARBON ARIZONA	2	003067839JJ	K Shipped: 08/20/2010	COPY 3 DNR Received: 09/01/2010 B	atch/Seq: 1260 / 209
PAD881736188   SIEMENS WATER TECH CORP   G8/20/2010	<u>م:</u>		Received: 08/25/2010	TSD EPA ID: AZD982441263 TSD Facility Name: WES	STATES CARBON ARIZONA .
Page No.   Line No.   Waste Code/Description   Amount Shipped/Link   Libe Shipped		[	Transporter EPA ID	Transporter Name	Transporter Date-
1	80	1	PAD981739188	SIEMENS WATER TECH CORP	08/20/2010
Manifest Lbs. Total   2,400	13,	<u>-</u>	Page No. Line No.	Waste Code/Description	Amount Shipped/Unit Lbs Shipped
003087841.JJK Shipped: 08/12/2010	No,		1 Samuel Samuel	FOD1- SPENT HALO SOLVENTS USED IN DEGREASING	
Received: 08/18/2010   TSD EPA ID: MID980991588   TSD Facility Name: EQ DETROIT INC				RO SEGONDARY GOPY AVAILABLE	
Received: 08/18/2010   TSD EPA ID: MID980991588   TSD Facility Name: EQ DETROIT INC			• .		
Transporter EPA ID   Transporter Name   Transporter Date	" and the second of the second	003087841JJ	K Shipped: 08/12/2010	COPY 3 DNR Received: 09/01/2010 B	atch/Seq; 1260 / 171.
1	"		Received: 08/18/2010	TSD EPA ID: MID980991556 TSD Facilty Name: EQ	DETROIT INC
Page No.   Line No.   Waste Code/Description   Amount Shipped/Unit   Lbs Shipped		,	Transporter EPA ID	Transporter Name	Transporter Date
1 1 U226- 1,1,1-TRICHLOROMETHANE 15 G 125    Manifest Lbs, Total   125   Manifest Lbs, Total   125   Manifest Lbs, Total   125   Manifest Lbs, Total   125   NO SECONDARY COPY AMILABLE   NO SECONDARY COPY AMILABLE			ILD984785238	HAZCHEM ENVIRONMENTAL CORP	08/12/2010
Manifest Lbs. Total   125		•	Page No. Line No.	Waste Code/Description	Amount Shipped/Unit Lbs Shipped
NO SECONDARY GOPY ANNUABLE			1 1	U226- 1,1,1-TRICHLOROMETHANE	
D03067836JJK Shipped; 02/22/2010   COPY 3   DNR Received: 03/17/2010   Batch/Seq: 1174 / 94					Manifest Lbs, Total 125
Received: 03/01/2010   TSD EPA ID: AZD982441263   TSD Facility Name: WESTATES CARBON ARIZONA				no secondary copy axailable	
Received: 03/01/2010   TSD EPA ID: AZD982441263   TSD Facility Name: WESTATES CARBON ARIZONA	- MANAGEMENT	•			
Transporter EPA ID         Transporter Name         Transporter Date           PAD981739188         SIEMENS WATER TECH CORP         02/22/2010           Page No. Line No.         Waste Code/Description         Amount Shipped/Unit         Lbs Shipped           1         1         F001- SPENT HALO SOLVENTS USED IN DEGREASING         4400 P         4,400           Manifest Lbs. Total         4,400	_emile of the second	003067836JJ	K Shipped: 02/22/2010	COPY 3 DNR Received: 03/17/2010 B	atch/Seq: 1174 / 94
PAD981739188         SIEMENS WATER TECH CORP         02/22/2010           Page No. Line No.         Waste Code/Description         Amount Shipped/Unit         Lbs Shipped           1         1         F001- SFENT HALO SOLVENTS USED IN DEGREASING         4400 P         4,400           Manifest Lbs. Total         4,400		4	Received: 03/01/2010	TSD EPA ID: AZD982441263 TSD Facility Name: WE	STATES CARBON ARIZONA
Page No. Line No. Waste Code/Description Amount Shipped/Unit Los Shipped  1 1 F001- SPENT HALO SOLVENTS USED IN DEGREASING 4400 P 4,400    Manifest Liss. Total 4,400   Manifest Liss. Total 4,400   Manifest Liss. Total 4,400   Manifest Liss. Total 4,400   Manifest Liss. Total 4,400   Manifest Liss. Total 4,400   Manifest Liss. Total 4,400   Manifest Liss. Total 4,400   Manifest Liss. Total 4,400   Manifest Liss. Total 4,400   Manifest Liss. Total 4,400   Manifest Liss. Total 4,400   Manifest Liss. Total 4,400   Manifest Liss. Total 4,400   Manifest Liss. Total 4,400   Manifest Liss. Total 4,400   Manifest Liss. Total 4,400   Manifest Liss. Total 4,400   Manifest Liss. Total 4,400   Manifest Liss. Total 4,400   Manifest Liss. Total 4,400   Manifest Liss. Total 4,400   Manifest Liss. Total 4,400   Manifest Liss. Total 4,400   Manifest Liss. Total 4,400   Manifest Liss. Total 4,400   Manifest Liss. Total 4,400   Manifest Liss. Total 4,400   Manifest Liss. Total 4,400   Manifest Liss. Total 4,400   Manifest Liss. Total 4,400   Manifest Liss. Total 4,400   Manifest Liss. Total 4,400   Manifest Liss. Total 4,400   Manifest Liss. Total 4,400   Manifest Liss. Total 4,400   Manifest Liss. Total 4,400   Manifest Liss. Total 4,400   Manifest Liss. Total 4,400   Manifest Liss. Total 4,400   Manifest Liss. Total 4,400   Manifest Liss. Total 4,400   Manifest Liss. Total 4,400   Manifest Liss. Total 4,400   Manifest Liss. Total 4,400   Manifest Liss. Total 4,400   Manifest Liss. Total 4,400   Manifest Liss. Total 4,400   Manifest Liss. Total 4,400   Manifest Liss. Total 4,400   Manifest Liss. Total 4,400   Manifest Liss. Total 4,400   Manifest Liss. Total 4,400   Manifest Liss. Total 4,400   Manifest Liss. Total 4,400   Manifest Liss. Total 4,400   Manifest Liss. Total 4,400   Manifest Liss. Total 4,400   Manifest Liss. Total 4,400   Manifest Liss. Total 4,400   Manifest Liss. Total 4,400   Manifest Liss. Total 4,400   Manifest Liss. Total 4,400   Manifest Liss. Total 4,400   Manifest Liss. Total 4,400   Manifest Liss. Total 4			Transporter EPA ID	Transporter Name	Transporter Date
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Manifest Lips, Total 4,400		· · · · ·	Page No. Line No.	Waste Code/Description	Amount Shipped/Unit Lbs Shipped
		•	1 1	F001- SPENT HALO SOLVENTS USED IN DEGREASING	4,400 P 4,400
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# HAZARDOUS WASTE MANIFEST RECORDS FOR SELECTED GENERATOR SHIPPED BETWEEN 01/01/2008 AND 02/04/2013

02/05/2013 Page 5 of 9

003067915JJK Shipped: 01/22/2010 DNR Received: 02/19/2010 Batch/Seq: 1166 / 75 COPY 3 Received: 02/02/2010 TSD EPA ID: AZD982441263 TSD Facility Name: WESTATES CARBON ARIZONA Transporter EPA ID Transporter Name Transporter Date PAD981739188 SIEMENS WATER TECH CORP 01/22/2010 Page No. Line No. Waste Code/Description Amount Shipped/Unit Lbs Shipped 1 F001- SPENT HALO SOLVENTS USED IN DEGREASING 2000 P 2,000 Manifest Lbs. Total 2,000 ENGISECONDARY COPY AVAILABLE 003067911JJK Shipped: 09/22/2009 DNR Received: 10/14/2009 Batch/Seq: 1131 / 911 COPY 3 Received: 10/07/2009 TSD EPA ID: AZD982441263 TSD Fadity Name: WESTATES CARBON ARIZONA Transporter EPA ID Transporter Name Transporter Date PAD981739188 SIEMENS WATER TECH CORP 09/22/2009 Page No. Line No. Waste Code/Description Amount Shipped/Unit Lbs Shipped F001- SPENT HALO SOLVENTS USED IN DEGREASING 2400 P 2,400 Manifest Lbs, Total 2,400 003067808JJK Shipped: 06/16/2009 Batch/Seq: 1125 / 915 COPY 3 DNR Received: 09/15/2009 Received: 06/26/2009 TSD EPA ID: AZD982441263 TSD Facilty Name: WESTATES CARBON ARIZONA Transporter EPA ID Transporter Name Transporter Date INR000022798 SIEMENS WATER TECHNOLOGIES TRANSPORT CORP 06/16/2009 Lbs Shipped Page No. Line No. Waste Code/Description Amount Shipped/Unit F001- SPENT HALO SOLVENTS USED IN DEGREASING 4400 P 4,400 Manifest Lbs, Total 4.400

Batch/Seq: 1029 / 2 003067904JJK Shipped: 02/09/2009 DNR Received: 03/06/2009 COPY 3 TSD Facility Name: WESTATES CARBON ARIZONA Received: 02/19/2009 TSD EPA ID: AZD882441263 مــّ Transporter Date Transporter Name Transporter EPA ID SIEMENS WATER TECHNOLOGIES TRANSPORT CORP. 02/09/2009 INR000022798  $\infty$ 1348 Amount Shioped/Unit Lbs Shipped Waste Code/Description Page No. Line No. 0. 5500 P 5,500 FOD! - SPENT HALO SOLVENTS USED IN DEGREASING 1 Manifest Lbs. Total 5,500 MO SECONDARY COPY AVAILABLE Batch/Seq: 1029 / 230 DNR Received: 03/06/2009 004560924JJK Shipped; 02/02/2009 COPY 3 TSD Facility Name: MICHIGAN DISPOSAL Received: 02/09/2009 TSD EPAID: MID000724831 Transporter Date Transporter EPA ID Transporter Name HAZCHEM ENVIRONMENTAL CORP 02/02/2009 !L0984785238 02/03/2009 EQ INDUSTRIAL SERVICES INC MI0000263871 Lbs Shipped Amount Shipped/Unit Waste Code/Description Page No. Line No. 1500 P 1,500 2 FOO!- SPENT HALO SOLVENTS USED IN DEGREASING 1500 P 1,500 FOOT SPENT HALO SOLVENTS USED IN DEGREASING 3,000 Manifest Lbs. Total NO SECONDARY COPY AVAILABLE Batch/Seq: 1026 / 817 DNR Received: 02/13/2009 004660925JJK Shipped: 02/02/2009 COPY 3 TSD Facility Name: EQ DETROIT INC Received: 02/03/2009 TSD EPA 1D: MID980991566 Transporter Date Transporter EPA (D Transporter Name 02/02/2009 HAZCHEM ENVIRONMENTAL CORP ILD984785238 Lbs Shipped Amount Shipped/Unit Page No. Line No. Waste Code/Description 10 10 U226- 1,1,1-TRICHLOROMETHANE Manifest Lbs. Total 10

02/05/2013 Page 7 of 9

No. 1348 P. 24

003067902JJK Shipped: 01/07/2009 DNR Received; 02/03/2009 Batch/Seq: 1025 / 1000 COPY 3 Received: 01/09/2009 TSD EPA ID: PAD987270725 TSD Facilty Name: ENVIROTROL INC Transporter EPA ID Transporter Name Transporter Date INR000022798 SIEMENS WATER TECHNOLOGIES TRANSPORT CORP 01/07/2009 Page No. Line No. Waste Code/Description Amount Shipped/Unit Lbs Shipped F001- SPENT HALO SOLVENTS USED IN DEGREASING 7200 P 7,200 Manifest Lbs. Total 7,200 等于这是是最高等。加索和斯曼·NOISECONDARYIGOPYXXVALID 004698470JJK Shipped: 10/20/2008 DNR Received: 12/09/2008 COPY 3 Batch/Seq; 1014 / 735 Received: 11/07/2008 TSD EPA ID: MID000724831 TSD Facilty Name: MICHIGAN DISPOSAL Transporter EPA ID Transporter Name Transporter Date ILD984785238 HAZCHEM ENVIRONMENTAL CORP 10/20/2008 MJ0000263871 EQ INDUSTRIAL SERVICES INC. 10/29/2008 Page No. Line No. Waste Code/Description Amount Shipped/Unit Lbs Shipped 2 F001- SPENT HALO SOLVENTS USED IN DEGREASING 175 G 1,460 F001- SPENT HALO SOLVENTS USED IN DEGREASING 200 P 200 Manifest Lbs. Total 1,860 004898471JJK Shipped: 10/20/2008 DNR Received: 12/09/2008 Batch/Seq: 1014 / 734 COPY 3 Received: 10/29/2008 TSD Facility Name: EQ DETROIT INC TSD EPA ID: MID980991566 Transporter EPA ID Transporter Name Transporter Date ILD984785238 HAZCHEM ENVIRONMENTAL CORP 10/20/2008 Page No. Line No. Waste Code/Description Amount Shloped/Unit Lbs Shipped U226- 1,1,1-TRICHLOROMETHANE 85 G 459 Manifest Lbs, Total 459

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02/05/2013 Page 8 of 9

		SHIPPED BETWEEN 01/01/2008 AND 02/04/20	J.L.)	······································
25	004588082JJK Shipped: 07/14/2008 Received: 07/15/2008	COPY 3 DNR Received: 08/26/2008 Bath TSD EPA ID: MID000724831 TSD Facility Name: MICHI	ch/Seq: 997 / 940 . GAN DISPOSAL	
<u>a-</u>	Transporter EPA ID	Transporter Name	Transporter Date	,
	W1000815381	ADVANCED WASTE SERV INC - ADV. WASTE CARRIER	07/14/2008	•
348		Waste Code/Description	Amount Shipped/Unit	Lbs Shipped
_	<del></del>	F001- SPENT HALO SOLVENTS USED IN DEGREASING	55 G	459
No.	1 1	FOO! SPENT HALO SOLVENTS USED IN DEGREASING	300 P	300
	1 2	FOOT- SPENT HALO SOLVENTS OSED IN DEGREASING	Manifest Lbs. Total	759
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	003067801JJK Shipped: 06/30/2008 Received: 07/03/2008	COPY 3 DNR Received: 07/25/2008 Bat TSD EPA ID: PAD987270725 TSD Facility Name: ENVII	ch/Seq: 992 / 188 ROTROL INC	•
	Transporter EPAID	Transporter Name	Transporter Date	-
	INR000022798	SIEMENS WATER TECHNOLOGIES TRANSPORT CORP	06/30/2008	
	PAD980707442	WEAVERTOWN TRANSPORT LEASING INC	07/01/2008	•
	Page No. Line No.		Amount Shipped/Unit	Lbs Shipped
	Fage 140. Line 140.	F001- SPENT HALO SOLVENTS USED IN DEGREASING	1200 P	1,200
	1	1001 01 -141 11112 4-41 -1111 4-4-5	Manifest Lbs. Total	1,200
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	002873807JJK Shipped: 04/16/2008	COE 1 3	tch/Seq: 989 / 314	
	Received: 05/08/2008	TSD EPA ID: MID000724831 TSD Facilty Name: MICH	IIGAN DISPOSAL	
	Transporter EPA ID	Transporter Name	Transporter Date	
	WI0000122358	FUTURE ENVIRONMENTAL INC	04/16/2008	
	TXR000077970	VEOLIA ES INDUSTRIAL SERVICES INC	04/30/2008	
-	Page No. Line No	. Waste Code/Description	Amount Shipped/Unit	Lbs Shipped
44PM	1 2	F001- SPENT HALO SOLVENTS USED IN DEGREASING	5000 P	5,000
: 44	1 1	F001- SPENT HALO SOLVENTS USED IN DEGREASING	800 P	800
$\langle \cdot \rangle$	, I	,	Manifest Lbs. Tota	5,800

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02/05/2013 Page 9 of 9

\_\_ No. 002873808JJK Shipped; 04/16/2008

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DNR Received: 06/03/2008

Batch/Seq: 985 / 887

Received: 05/08/2008

TSD.EPA ID: MID980991566

TSD Fadity Name: EQ DETROIT INC

Transporter EPA ID	Transporter Name	Transporter Date
WI0000122358	FUTURE ENVIRONMENTAL INC	04/16/2008
TXR000077970	VEOLIA ES INDUSTRIAL SERVICES INC	04/30/2008

Page No. Line No.

Waste Code/Description

Amount Shipped/Unit

Lbs Shipped

200 P

200

U225- TRIBROMOMETHANE

Manifest Lbs. Total

200

003067929JJK Shipped: 01/15/2008

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DNR Received: 01/25/2008

Batch/Seq: 953 / 1633

Received: 01/17/2008

TSD EPA ID: PAD987270725

TSD Facility Name: ENVIROTROL INC.

Transporter EPA ID	Transporter Name	Transporter Date	
INR000022788	SIEMENS WATER TECHNOLOGIES TRANSPORT CORP	01/15/2008	

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Wasta Code/Description

Amount Shipped/Unit

Lbs Shipped

F001- SPENT HALO SOLVENTS USED IN DEGREASING

6000 P Manifest Lbs. Total

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EPA Form 8700-22 (Rev. 3-05) Previous editions are obsolete.

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